



Summary Report of the OCP Consultation Panel on Major Outcomes from OCP Public Consultations

7 July to 5 August 1997



OCP Consultation Panel:

**Professor Ian Rae, Dr Peter Brotherton, Mr Claude Gauchat,
Ms Mariann Lloyd-Smith and Mr Volker Maier**

Supported by members of the Waste Management Secretariat:

Dr Paul Bainton, Mr Andrew Chalklen, Ms Alison Meeks and Mr Ian Reichstein

September 1998

This report has been prepared and published on behalf of the OCP Consultation Panel by:

Waste Management Secretariat

c/- Environment Australia

PO Box E305

KINGSTON ACT 2604

Phone: 1800 657 945

(02) 6274 1475

Fax: (02) 6274 1230

E-mail: ocp@ea.gov.au

TABLE OF CONTENTS

GLOSSARY/DEFINITIONS	i
A. INTRODUCTION.....	1
B. SUMMARY — MAJOR ISSUES	1
C. BACKGROUND TO THE OCP CONSULTATIONS SUMMARY REPORT.....	2
HISTORY AND CONTEXT	2
THE SCHEDULED WASTES PROCESS.....	2
THE NATIONAL ADVISORY BODY AND THE SCHEDULED WASTES MANAGEMENT GROUP	3
NATIONAL PROTOCOL FOR COMMUNITY CONSULTATION	3
D. THE PUBLIC INVOLVEMENT PROGRAM FOR THE OCP WASTE MANAGEMENT PLAN – PHASE 3.....	4
OCP CONSULTATION PANEL	4
THE PANEL MEMBERS.....	4
THE DOCUMENTS.....	5
THE PUBLIC WORKSHOPS.....	5
THE NETWORKING STRATEGY.....	5
ADVERTISING AND NETWORKING	7
PROTOCOL FOR THE PUBLIC WORKSHOPS.....	7
THE RESULTS OF THE PUBLIC WORKSHOPS.....	7
E. OBSERVATIONS ON PHASE 3 OF THE OCP PUBLIC INVOLVEMENT PROGRAM.....	8
COMMENTS ON THE WORKSHOPS.....	8
F. MAJOR OUTCOMES FROM THE OCP WORKSHOPS	9
COMMENTS RELATING TO THE DRAFT FINAL OCP WASTE MANAGEMENT PLAN.....	9
General.....	9
Preface.....	11
Section 1: Definitions.....	11
Section 2: Scope	12
Section 3: Collections	22
Section 4: OCP sampling and analysis	50
Section 5: Notifiable quantity	52
Section 6: OCP-contaminated soil.....	54
Section 7: OCP waste storage, handling and transport	55
Section 8: Destruction of scheduled OCP waste	69
Section 9: Disposal of OCP waste to landfill.....	76
Section 10: OCP monitoring.....	78
Section 11: Certification.....	84
Section 12: Community participation, education and training	85
Section 13: Review	98
Appendix A: OCPs on ANZECC’s Schedule X.....	99
Appendix B: Segregation requirements for scheduled OCP waste.....	99
Appendix C: Guidance note for the disposal of non-scheduled solid OCP waste.....	99
Appendix D: Extract from the National Protocol for the Approval/Licensing of Commercial-scale Facilities for the Treatment of Schedule X Wastes (July 1994).....	100

COMMENTS RELATING TO THE DISCUSSION PAPER ON COLLECTION AND DESTRUCTION OF UNWANTED FARM AND HOUSEHOLD CHEMICALS.....	101
General.....	101
Section 1: Setting the scene.....	101
Section 2: Scope of the unwanted chemicals issue.....	101
Section 3: Some coordination options for making it happen.....	102
Section 4: Operational aspects of managing unwanted farm and household chemicals.....	102
Section 5: Future management of agricultural and veterinary chemicals.....	116
Section 6: Conclusions.....	116
Appendix A: National Collection, Storage and Destruction Scheme Steering Committee membership.....	116
Appendix B: Possible institutional relationship between a coordinating body and other national chemicals collection scheme players.....	116
Appendix C: Chemical collection program case studies.....	116
APPENDICES.....	A-1
APPENDIX I: NATIONAL PROTOCOL FOR COMMUNITY CONSULTATION.....	A-3
APPENDIX II: SAMPLE LETTERS OF INVITATION TO ATTEND WORKSHOPS.....	A-5
APPENDIX III: LIST OF WRITTEN SUBMISSIONS RECEIVED.....	A-14
APPENDIX IV: SAMPLE MEDIA RELEASE.....	A-16
APPENDIX V: LIST OF MEDIA ORGANISATIONS CONTACTED.....	A-20
APPENDIX VI: WORKSHOP AGENDA.....	A-24
APPENDIX VII: LIST OF ATTENDEES AT THE OCP WORKSHOPS.....	A-26
APPENDIX VIII: LIST OF INFORMATION RECEIVED FROM THE COMMUNITY.....	A-34
APPENDIX IX: WORKSHOP EVALUATION FORM.....	A-35
APPENDIX X: FEEDBACK FROM THE EVALUATION FORMS.....	A-39

GLOSSARY/DEFINITIONS

To improve the readability of this document, we have tried to avoid using acronyms. However, it has been necessary to use a few acronyms to reduce the volume of the report. The following glossary should assist:

ADG Code	<i>Australian Code for the Transport of Dangerous Goods by Road and Rail;</i>
ANZECC	Australian and New Zealand Environment and Conservation Council (the Ministerial Council of Commonwealth, State, Territory and New Zealand Environment Ministers);
Draft OCP Waste Management Plan	The version of the <i>OCP Waste Management Plan</i> released in November 1996 for use in the second phase of the OCP public involvement program;
Draft Final OCP Waste Management Plan	The version of the <i>OCP Waste Management Plan</i> released in May 1997 for use in the third phase of the OCP public involvement program;
NAB	National Advisory Body on Scheduled Wastes, established by ANZECC to advise on the development of management plans for scheduled wastes;
NATA	National Association of Testing Authorities (Australia);
National Strategy	This consists of the <i>Draft National Strategy for the Management of Scheduled Waste (Nov. 1992)</i> , supplemented and amended by the <i>Scheduled Wastes Working Group Report to the Australian and New Zealand Environment and Conservation Council (Version B, May 1993)</i> ;
NCSDS	National Collection, Storage and Destruction Scheme, being developed by the NCSDS Steering Committee, for unwanted rural chemicals;
NCSDS Discussion Paper	<i>Discussion Paper on Collection and Destruction of Unwanted Farm and Household Chemicals</i> , prepared by the NCSDS Steering Committee;
NCSDS Steering Committee	A joint steering committee of ANZECC and its agricultural counterpart, the Agricultural and Resource Management Council of Australia and New Zealand (ARMCANZ), responsible for developing the NCSDS;

OCP	For the purposes of this document, this refers to those organochlorine pesticides listed on ANZECC's Schedule X (ie Aldrin, Chlordane, DDT, Dieldrin, Endrin, Heptachlor, Hexachlorobenzene, Hexachlorophene, Isodrin, Lindane and Hexachlorocyclohexane isomers, Pentachloronitrobenzene, Pentachlorophenol, 2,4,5-T and the breakdown products DDD, DDE and Heptachlor epoxide);
OCP public involvement program	The formal consultation program established to consult with interested parties on an <i>OCP Waste Management Plan</i> ;
OCP Waste Management Plan	A plan for the safe management, storage, transport and disposal of Australia's OCP waste, prepared on behalf of ANZECC as part of the National Strategy and endorsed in principle by ANZECC in December 1997;
SWMG	Scheduled Wastes Management Group, established by ANZECC to implement, review and advise on the National Strategy; and
Waste Management Secretariat	A secretariat established to service the NAB and SWMG, located in the Environment Protection Group of Environment Australia, Canberra. Address: 40 Macquarie Street, Barton ACT 2600 (street)/ PO Box E305 Kingston ACT 2604 (postal); Telephone: 1800 657 945/(02) 6274 1475; Facsimile: (02) 6274 1230; E-mail: ocp@ea.gov.au

A. INTRODUCTION

A public involvement program was conducted to assist in preparation of the *Organochlorine Pesticides (OCP) Waste Management Plan*. Phase 1 entailed a call for written public submissions through national newspapers and the formulation of a *Draft OCP Waste Management Plan*. Following this, pilot public forums were conducted in Traralgon, Victoria and Toowoomba, Queensland in September 1996, after which public forums were held at 28 venues around the country during phase 2 in November–December 1996 and February–March 1997 to allow the community to discuss the draft plan and make suggestions to assist with its further revision.

Following these meetings, the *Draft OCP Waste Management Plan* was revised to take into account the oral and written comments received in the first and second phases, as well as comments made by the National Advisory Body and the Scheduled Wastes Management Group. A *Draft Final OCP Waste Management Plan* was then issued, and 10 workshops were held around the country to focus on practical aspects of the draft final plan and possible options for collecting the waste.

This document reports on the outcomes from the third phase of the public involvement program. It addresses comments arising from the public sessions and written submissions. In line with the agreed ANZECC process for developing management plans for scheduled wastes (see Section C – Background), this report is being released publicly, following finalisation of the *OCP Waste Management Plan*, which was endorsed in principle by ANZECC in December 1997.

B. SUMMARY — MAJOR ISSUES

Several major issues emerged from phase 3 of the OCP public involvement program. These included:

- ?? funding and implementation of the management plan (particularly collection of OCPs);
- ?? the need for regional variation in developing collection options;
- ?? the question of amnesty from prosecution for holding OCPs;
- ?? liability for and ownership of OCP waste during and after collections;
- ?? safe transport of OCP waste;
- ?? availability or otherwise of destruction facilities;
- ?? whether dip sites and scooping mounds should be covered by the plan;
- ?? getting the message across to all those who store and transport OCP wastes;
- ?? disposal of non-scheduled OCP waste to landfill

C. BACKGROUND TO THE OCP CONSULTATIONS SUMMARY REPORT

History and context

In October 1993, the Australian and New Zealand Environment and Conservation Council (ANZECC), which is made up of Commonwealth, State, Territory and New Zealand Environment Ministers, agreed to implement a national strategy to manage Australia's scheduled wastes. A key aspect of this strategy is that management plans are to be developed for each type of scheduled waste: polychlorinated biphenyls (PCBs), industrial hexachlorobenzene (HCB) waste and organochlorine pesticides (OCPs). (A fourth management plan, for other chlorinated hydrocarbons, was originally envisaged, but ANZECC has now decided that this will not be necessary.)

These plans are to be developed openly and are to address:

- quantities and concentrations of the waste for which special management provisions are required;
- sources and quantities of the wastes;
- dates for completion of disposal, including phase-out dates for equipment containing scheduled wastes (where this is relevant);
- storage, handling and transport requirements;
- standards for emissions, effluents and residues from treatment and disposal technologies; and
- requirements for disposal of effluents/residues generated in treatment.

The Report of the Scheduled Wastes Working Group to ANZECC (May 1993) examined three options for developing the plans. Each option involved different lengths of public consultation. The endorsed option consists of two formal opportunities for public participation with an estimated time for completion of 12-15 months for each management plan.

The scheduled wastes process

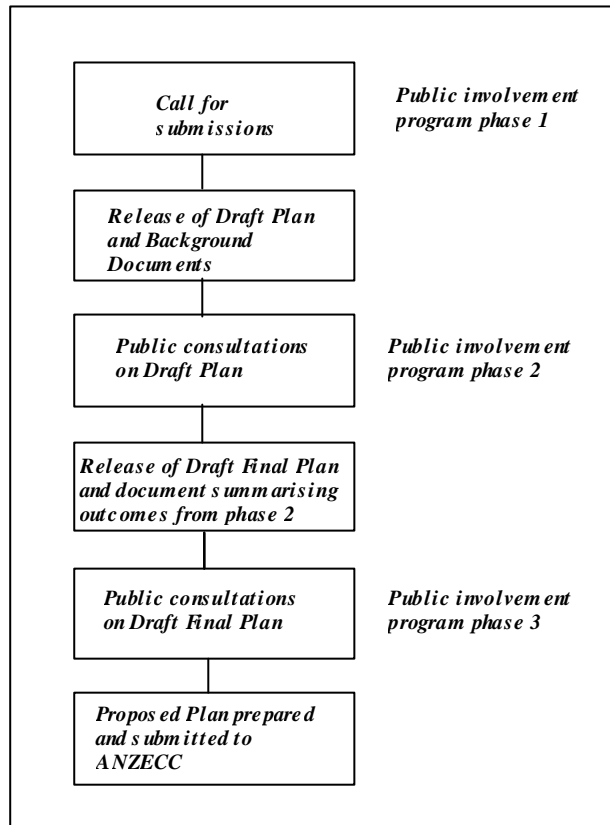
For each plan, advertisements are placed in the national press and other appropriate publications, indicating the intention to develop a management plan and inviting submissions from individuals and organisations. Mailing list contacts are also notified.

A draft management plan is then prepared and released for public comment together with documents summarising background information and issues that should be considered in preparing the management plan. The availability of these documents is communicated widely. Comment is sought on the draft plan and discussion promoted through public forums and, where requested, individual sessions with interested groups. All the input from this phase of the public involvement program is taken into account in preparing a revised plan.

This revised or draft final management plan is then released together with feedback on comments received during the second public consultation phase. The third phase of the public involvement program commences, with further public forums and associated activities.

The draft final management plan is further revised and a proposed management plan is then submitted to ANZECC for endorsement. The endorsed management plan is implemented by State and Territory governments.

AGREED PROCESS FOR DEVELOPING MANAGEMENT PLANS



The National Advisory Body and the Scheduled Wastes Management Group

ANZECC has established two committees to develop and assist in implementing the National Strategy: the Scheduled Wastes Management Group (SWMG), consisting of government officials, and the National Advisory Body (NAB), comprising representatives of key stakeholders. Environment groups, industry groups (waste holders and treatment technology holders), trade unions, local government, farmers and waste managers are all represented on the NAB.

These two committees are assisted by the Waste Management Secretariat, located within Environment Australia, in Canberra. Professor Ian Rae provides a common link between the two committees, being independent Chair of both.

National protocol for community consultation

During 1994, the NAB and the SWMG developed a National Protocol for Community Consultation on Scheduled Wastes (see Appendix I). This sets out aims and principles for

consulting the public on the development of management plans for scheduled wastes. The aims are to:

- enhance the development, adoption and implementation of effective management plans for scheduled wastes;
- maximise understanding of and involvement in debate on the various scheduled waste management plans;
- place scheduled waste management issues clearly within the context of broader waste management issues; and
- achieve the most socially acceptable outcome possible in the development and finalisation of management plans, taking account of environmental, economic and social factors.

In short, the development of management plans is to be underpinned by a sense of fairness, equity, continuity, feedback and a comprehensive and open exchange of information between interested parties and the NAB and the SWMG. The National Protocol has been agreed by the NAB and the SWMG and was endorsed by ANZECC in November 1994. It was revised in 1996 to reflect experience with the PCB and HCB waste management plans.

D. THE PUBLIC INVOLVEMENT PROGRAM FOR THE OCP WASTE MANAGEMENT PLAN – PHASE 3

OCP Consultation Panel

Essentially the same OCP Consultation Panel which undertook consultations during phase 2 of the public involvement program also undertook the consultations during phase 3. One member of the original Panel, Lisa Florian, withdrew from the Panel before the commencement of phase 3. Also, as with the phase 2 forums, David Wolfenden was unavailable to attend the phase 3 workshops. The Panel's task again was to oversee and facilitate the public consultation activities for the *OCP Waste Management Plan*. The Panel's terms of reference were to:

- seek and facilitate the presentation of views from interested parties on matters relating to the development of the Management Plan; and
- report on these views to the NAB, SWMG and participating interested parties.

As with the redrafting of the *Draft OCP Waste Management Plan*, the Consultation Panel played a pivotal role in providing advice to the NAB and the SWMG on the revision of the *Draft Final OCP Waste Management Plan*.

The Panel Members

Professor Ian Rae (Panel Chair)	Chair of the NAB and the SWMG; formerly Deputy Vice-Chancellor of the Victoria University of Technology.
Dr Peter Brotherton	Australian Conservation Foundation representative on the NAB; Director, Sustainable Solutions Pty Ltd.

Mr Claude Gauchat	Avcare (National Association for Crop Protection and Animal Health) representative on the NAB; Executive Director, Avcare.
Ms Mariann Lloyd-Smith (formerly Grinter)	Conservation Council of NSW representative on the NAB; co-convenor of the National Toxics Network (NTN) and co-ordinator of NTN Community Information Systems.
Mr Volker Maier	Plastics and Chemicals Industries Association of Australia representative on the NAB; Health, Safety and Environmental Manager for Nufarm.
Mr David Wolfenden	National Farmers Federation representative on the NAB.

The documents

Two key documents were used in the third phase of the OCP public involvement program: the *Draft Final OCP Waste Management Plan* and the *Discussion Paper on Collection and Destruction of Unwanted Farm and Household Chemicals*.

The public workshops

Following the extensive second phase of the public involvement program in which three-hour public forums were held at 30 venues (including the pilot consultations), the NAB decided that for phase 3, it would be appropriate to hold a smaller number of all-day workshops to discuss the issues in greater depth. It was decided to select one venue per State/Territory, with two in the largest States (ie Western Australia and Queensland). The locations of those workshops were:

Western Australia	Bunbury Merredin	Queensland	Stanthorpe Townsville
South Australia	Hahndorf	Tasmania	Hobart
New South Wales	Dubbo	Victoria	Horsham
Australian Capital Territory	Canberra	Northern Territory	Darwin

(See Appendix II for additional details on the workshop venues.)

The networking strategy

The networking strategy to maximise public attendance for the workshops involved the following key elements:

1. Sending targeted letters of invitation (see Appendix II) to people who, because of the office they held, their position in the community and/or their knowledge of relevant matters, were identified by the Panel as people whose attendance at a particular

workshop was essential. These included:

- ?? Commonwealth, State and Territory Members of Parliament for the electorates in which the workshop venues were situated
- ?? Commonwealth, State and Territory Departments of Agriculture, Health and Environment
- ?? Lions, Rotary and other service organisations
- ?? Environment Victoria
- ?? Mayors/Shire Presidents
- ?? Organisations listed in the ACF Green Pages and Environmental Monitoring Booklet
- ?? Universities
- ?? Environment Centres
- ?? Shire Clerks
- ?? State and National Farmers Federations
- ?? Schools
- ?? Health Centres
- ?? National Association for Sustainable Agriculture, Australia
- ?? Emergency Services
- ?? Devolution Committees
- ?? Container Management Committees
- ?? Commonwealth, State and Territory Ministers for Environment and Agriculture
- ?? Country Women's Associations
- ?? South East Queensland Development Board
- ?? Conservation Councils
- ?? National Toxics Network
- ?? Occupational Health and Safety organisations
- ?? Neighbourhood Centres
- ?? Cattlecare
- ?? Chambers of Commerce
- ?? State WorkCover bodies
- ?? Newspapers and magazines
- ?? Radio and television stations
- ?? Parents & Citizens Groups
- ?? Biological Farmers Association
- ?? National Registration Authority
- ?? Avcare
- ?? Aboriginal Land Councils

2. Inviting people on our mailing list (see generic letter of invitation at Appendix II) at the same time as sending them a copy of the *Draft Final OCP Waste Management Plan*.
3. Contacting the constituent groups represented by the National Advisory Body members.
4. Sending workshop packages to those intending to attend a workshop (or who otherwise requested one). The workshop packages contained the workshop agenda, the *National Protocol for Community Consultation on Scheduled Wastes*, the *Draft Final OCP Waste Management Plan* (for the targeted invitees and others not previously on our mailing list only, as those on the mailing list would already have received this), the *Discussion Paper on Collection and Destruction of Unwanted Farm and Household Chemicals*, and fact sheets on technologies and quantities.
5. Placing the Draft Final OCP Plan, the NCSDS Discussion Paper and OCP-related fact sheets on the scheduled wastes web site
<http://www.environment.gov.au/portfolio/epg/swm.html#op>
6. Issuing press releases to print and electronic media three weeks prior to each of the workshop circuits, and following these with reminder notices one week before the commencement of each circuit (see Appendix IV for sample media release and Appendix V for a list of the media organisations contacted).

Advertising and Networking

During phase 2 of the public involvement program, the Panel shifted away from paid advertisements as very few people were indicating that they were made aware of the forums through this medium. Mid-way through that phase, paid advertising was replaced by an increased emphasis on intense networking activities to encourage community participation. This was done both to keep to the budget and to maximise the perceptions among individuals that their personal attendance was important to the success of the meetings. Extensive contact continued to be made with newspapers, newsletters, and radio and television stations to obtain both editorial content and community service announcements.

This approach was found to be more effective and less costly, so was again adopted for phase 3. A tele-networking agent was again engaged to conduct the one-on-one networking and to assist with contacting media outlets. A list of the media organisations contacted during phase 3 is at Appendix V.

Protocol for the public workshops

The National Protocol for Community Consultation on Scheduled Wastes provided the basis for the OCP public involvement program activities. The OCP Consultation Panel applied the following set of meeting procedures at each of the workshops:

1. Welcome from Chair
2. Background information on the process for developing scheduled wastes management plans and on the OCP Waste Management Plan itself
3. Panel members outlining particular sections of the Draft Final Plan and the NCSDS Discussion Paper and highlighting key issues involved, then seeking feedback from the floor
4. Comments and questions from the floor and responses from the Panel in an open forum for discussion
5. Summarising of key outcomes, facilitated by a Panel member
6. Conclusion and invitation from Chair to make written submissions

As the Panel wanted to focus discussion on particular issues and aspects of the Plan in these workshops, it prepared a detailed agenda (see Appendix VI). Initially this included running a 'hypothetical' at the beginning of the workshop, but this did not prove very successful in the earlier workshops and the forum structure was amended for the rest of the program.

Three Panel members facilitated each workshop, with assistance from a Waste Management Secretariat member who recorded proceedings.

The results of the public workshops

Section F of this report summarises the many points made during the third phase of the public involvement program, both at the workshops and from the written submissions (which are listed at Appendix III). It also provides responses from the Panel to the issues raised. Appendix

VII lists the attendees at the workshops. The community also provided some valuable information on OCPs, which was gratefully received by the Panel (see Appendix VIII).

E. OBSERVATIONS ON PHASE 3 OF THE OCP PUBLIC INVOLVEMENT PROGRAM

Comments on the workshops

From a total of 272 participants, 213 evaluation forms (see Appendix IX) were received. The data from these forms are presented in Appendix X. The results indicate that, as with the forums in the previous phase, the *accessibility of the venues* and their *facilities* were very well received. The accessibility of the venues was rated as either 'very good' or 'good' by 200 respondents, and 188 respondents found the facilities of the venues to be either 'good' or 'very good' (Figures A & B).

The *meeting times* were found by 202 participants at the workshops to be suitable, as indicated by the number of replies that found them either 'good' or 'very good' (Figure C), although presumably most of those who found them unsuitable were unable to attend meetings. However, the only alternative would have been to run meetings in the evening, which was not particularly successful in attracting attendees in phase 2.

Whereas for phase 2 of the public involvement program, responses regarding the *adequacy of the prior notice* of the meetings had been mixed, this time the responses indicated widespread satisfaction (Figure D). Of the responses received, 193 rated this aspect as 'very good' or 'good', with only 4 rating it 'not good'. This improvement can probably be attributed to a more concerted effort going into sending invitations out well in advance of the workshops, together with more effective mailing house operations.

From the evaluation responses received in phase 2, the Panel had identified publicity as an area to improve on, and shifted its approach away from paid advertising towards more networking, direct contact with targeted organisations and individuals, and providing media outlets with press releases and news announcements. This led to some increase in satisfaction with *advertising/publicity* as expressed through the responses received (Figure E); this time a majority rated this as 'good' or 'very good'. However, it remained clearly the weakest aspect canvassed, with 21 respondents recording 'not good' and 65 'indifferent' as compared with 83 'good' and only 33 'very good'. Nevertheless, the Panel feels that it would have been difficult to have made significant further improvement to its publicity campaign with the resources available.

As with the previous round of consultations, the opportunity for *public input during the meeting* was overwhelmingly judged to be either 'very good' (117) or 'good' (63) (Figure F). Only 3 rated it 'not good'. The responses to this question indicate that the Panel was successful in adapting its tried and proven approach to facilitating expression of views by the community in relatively short public forums, as held in previous consultations, to the expanded scale of the workshops conducted this time around.

The most successful specified means of *publicising* the meetings was through 'local organisations' (47), followed by 'word of mouth' (20) (Figure G). However, by far the largest number of respondents (140) marked 'other' on their forms. Most of these indicated in the space provided that they or their organisations had received a letter of invitation by virtue of being on the OCP mailing list or on the Panel's targeted workshop mailing list. Many had also

received a phone call from the Secretariat's tele-networking consultant. (Note that some respondents marked more than one category and/or indicated more than one 'other' means of finding out.) Media sources were the least commonly indicated means of finding out about the workshops, with only 2 respondents indicating that they had heard about it through a 'radio news report' and 7 that they had read about it in a 'newspaper article' (27). These results appear to vindicate the decision of the Panel to eschew paid advertising and focus on networking and mailing lists as the major means of communicating with the public and obtaining their interest in the OCP public involvement program.

F. MAJOR OUTCOMES FROM THE OCP WORKSHOPS

The OCP Consultation Panel and the Waste Management Secretariat have attempted faithfully to summarise comments made at each of the public workshops associated with the public involvement program and in written submissions. For each of the points raised, the Panel has provided a response, which we hope adequately addresses the issues raised.

With the comments relating to the *Draft Final OCP Waste Management Plan*, section references in the subheadings and in the left hand column (community comments) are to the *Draft Final OCP Waste Management Plan*, whereas section references in the right hand column (Panel responses) are to the final version of the *OCP Waste Management Plan* which was given in-principle endorsement by ANZECC in December 1997, except where otherwise indicated. With the comments relating to the *Discussion Paper on Collection and Destruction of Unwanted Farm and Household Chemicals*, section references in both columns are to the Discussion Paper, except where otherwise indicated.

Where possible, names of those providing the comments have been included. If this has not been possible, for example, where participants did not identify themselves or our recorder was unable to identify the speaker, the note 'unidentified' appears.

If you have concern with the response or with what we have recorded you as saying, please let the Secretariat know either by telephone: 1800 657 945 or (02) 6274 1475, by facsimile: (02) 6274 1230 or by e-mail: ocp@ea.gov.au

Comments relating to the Draft Final OCP Waste Management Plan

General

Community Comments	OCP Consultation Panel Responses
NHMRC should be fully involved or be a partner in the process. The Duggin cyclodienes report (1992) was a major impetus for OCP phase out which was taken up by the National Registration Authority. [Unidentified, Merredin workshop]	The involvement of the NHMRC would be welcomed.
Crop sprayers association could provide useful contacts. [Unidentified, Merredin workshop]	Agreed.

Community Comments	OCP Consultation Panel Responses
<p>Are these chemicals classified hazardous and/or dangerous goods (as defined in legislation)? [Cormack Dunn]</p>	<p>Many of them are. However, regardless of their formal classification these substances are on Schedule X because of the following properties: organic in nature; resistant to degradation by chemical, physical or biological means; toxic to humans, animals, vegetation or aquatic life; bioaccumulative in humans, flora and fauna.</p>
<p>Who is this a management plan for? There is a need for differently structured documents for different target groups – eg farmers would be likely to have trouble accessing the regulations cited in the plan so would need further details. [Gratton Wilson]</p> <p>New environmental protection legislation currently before the ACT Legislative Assembly should deal with a lot of these administrative problems and facilitate arrangements. The National Environment Protection Measure on the interstate transport of controlled waste should also assist. There is an obvious logic in sending material from Queanbeyan to Canberra rather than Sydney for treatment. [Tony Hodgson]</p>	<p>The Panel recognises that different information and advice will be needed by waste holders, local authorities and others – the management plan is the overarching document and a range of more specifically tailored materials and programs will be prepared during the implementation phase.</p> <p>Noted , although neither Canberra nor Sydney has a treatment facility for OCP waste at this stage.</p>
<p>The OCP Plan should include emergency management plans to control and recover public sites where accidental spillages of OCPs occur. [Darrell Thornthwaite]</p>	<p>Section 5.4 requires managers of collection points and consolidation stores to adopt and employ emergency containment and clean-up procedures, which will need to be approved by the agency. In establishing any new collection point or consolidation store, heed would need to be taken of agency requirements. Section 7.1 requires storage and transport to be in accordance with any relevant (including dangerous goods) legislation and any conditions required by the agency.</p>
<p>Why do we need ANZECC and ARMCANZ – can we do it without them? [Miles Blake]</p>	<p>ANZECC initiated this management plan.</p>
<p>When OCPs were used, they were legal, when bought, they were legal. [Roy Smith]</p>	<p>Noted, but the use of them is no longer legal.</p>
<p>Through ANZECC Ministers – stop the sale of these OCPs to third world countries. [Leon Huinck]</p>	<p>Australia does not sell scheduled OCPs to other countries.</p>
<p>What agreement is there with the Commonwealth to implement this plan? [Rob Curtis]</p>	<p>A Proposed OCP Plan was submitted to the ANZECC Ministers for endorsement in late 1997. The Ministers endorsed it in principle and asked for more information on possible costs of collection, storage and disposal. Once Ministers have obtained the support of their governments for the OCP Plan and given it full endorsement, each jurisdiction will then be expected to implement the Plan.</p>

Community Comments	OCP Consultation Panel Responses
<p>To enact the OCP management plan will be in conflict with the (Queensland) Contaminated Land Act. [Trevor Lloyd]</p> <p>We will have a problem to get this through the Queensland Government. [David Miles]</p> <p>Brisbane City Council is involved in operating the Gurulmundi landfill, while the EPA and Department of Primary Industry are responsible for the legislative process. [Trevor Lloyd]</p>	<p>Under the management plan, these are matters that will have to be sorted out within the Queensland jurisdiction, but the Plan is not intended to apply to contaminated land.</p>
<p>Do you envisage one government department having control over this whole plan? [Philip McMahon]</p>	<p>The Panel expects that the agency with primary responsibility for scheduled wastes in each jurisdiction will oversee implementation of the OCP Plan. Depending on administrative arrangements in individual jurisdictions, it is possible that other government agencies (such as agriculture/primary industry departments) may also have a role to play.</p>
<p>What is the relationship with the National Pollutant Inventory (NPI)? [Nigel Green]</p>	<p>No formal relationship exists. Ag/vet chemicals are not on the NPI, because the National Environment Protection Council (NEPC) Committee's view was that reporting on emissions of ag/vet chemicals required a different mechanism from that offered by the NPI. Ag/vet chemicals are usually deliberately applied (i.e. emitted to the environment) to achieve a particular purpose whereas industrial chemicals are not usually deliberately emitted. In addition, ag/vet chemicals are usually applied across large areas and the exact mechanism by which emissions could be estimated was unclear. Environment groups, however, have expressed concern about the restricted number of chemicals included initially on the NPI.</p>

Preface

Community Comments	OCP Consultation Panel Responses
<p>Will existing industry stockpiles be included in the process, particularly forests, rail and other potential large holders who are not farmers? They are not noted in either the Draft Final OCP Plan or the NCSDS Discussion Paper. [Peter Valentine]</p>	<p>Yes. Subsections 2.2 and 2.3 of the OCP Plan, which state what materials are covered by the Plan, apply regardless of whether the materials are on farms or elsewhere.</p>

Section 1: Definitions

Community Comments	OCP Consultation Panel Responses
<p>1.1 Is the 'agency' the environment department? [Peter DiMarco]</p> <p>Definition of 'agency' is unclear – any idea who this might be? [John Marks]</p>	<p>The agency is defined in Section 1.1 as the Commonwealth, State or Territory government agency responsible for scheduled wastes in the particular jurisdiction concerned.</p>

Community Comments	OCP Consultation Panel Responses
1.1 I suggest that the definition of agency refer to 'lead agency'. [Dagogo Ibiebele]	Agreed. Definition 1.1 has been amended.
1.12.3 Page 6 footnote 1 – 'NRS' should be 'NRA'. [Tony Britt]	Agreed – footnote has been amended.
1.15 Contaminated sites guideline is 10 ppm, so if remediation occurs then the usual procedure is to get levels below 10 ppm, but this is inconsistent with the <i>Draft Final OCP Waste Management Plan</i> . How will soil containing OCPs under houses for termite protection be dealt with under the Plan? On scientific grounds the 50 ppm level is difficult to support – how will this be dealt with? This creates a conflict with health regulations. [Peter DiMarco]	The contaminated sites guideline is still under development, but in any case the management plan does not cover contaminated soil. The 50 mg/kg cut-off point between scheduled and non-scheduled wastes is the same as in previous management plans (for PCBs and HCB) and has been negotiated between and widely accepted among stakeholder groups.
1.16 Where did the threshold quantity of 50g come from? [Bernard Milford]	This limit was also negotiated between the stakeholder groups.

Section 2: Scope

Community Comments	OCP Consultation Panel Responses
2 National Coalition for the Misuse of Chemicals (US) – poison poles are covered. [Alex Sas]	A report titled <i>Poison Poles: A Report About Their Toxic Trail and Safer Alternatives</i> by Jay Feldman and Terry Shistar is on the Internet at: http://www.ncamp.org/ Address and contact details for the National Coalition Against the Misuse of Pesticides are: 701 E Street, SE, Washington, DC 20003 USA Phone: 0011 1 202-543-5450 Fax: 0011 1 202-543-4791 E-mail: ncamp@igc.apc.org
2 Sink holes in karst were used for disposing of chemicals. [Stephen Waight]	This may need consideration during local implementation, but it is more likely a contaminated land issue.
2 I believe that irrespective of the number of collections in other Victorian regions, farmers are still retaining OCPs for termite control and related purposes. [Bruce Burrow]	We believe that this is a declining practice, but agree that some of this, unfortunately, is still occurring.
2 I have data on a local survey on chemical holdings. [Felicity Pritchard]	This information was subsequently supplied to us.
2 A staged process firstly dealing with chemicals in containers then dealing with contaminated material may be the best way of managing the process. [Bruce Burrow]	Opinion noted.
2.2 We need to be very definite about what our aim is (ie to pick up all the containers of OCPs) – don't exclude anything on cost grounds. [Unidentified, Canberra workshop]	Picking up all containers is the aim of the plan and, while all options will be considered, cost will clearly be a factor in decision-making.
2.2 What about all the small bottles? [Les Toohey]	These are covered under Section 2.2 of the OCP Plan.

Community Comments	OCP Consultation Panel Responses
2.2 I believe there are many more organochlorines that should be included on schedule X. [Michael Hogan]	The process for submitting other compounds for inclusion on Schedule X is outlined in Appendix A to the Plan.
2.2, 2.3 Are other chemicals besides OCPs going to be collected either under this plan or another? [Unidentified, Canberra workshop]	This plan covers only OCPs; options for the possible collection of a broader range of chemicals are considered in the NCSDS Discussion Paper.
2.2, 2.3 From a pragmatic point of view, there are obviously going to be materials delivered which will fall outside the scope of the plan – we will be left with the problem of deciding what to do with them – perhaps it is necessary to have 2 categories – OCPs and unwanted. [Ian Coleman]	In most chemical collections if people in good faith bring in non-target materials in reasonable quantities, these are usually accepted. The range of chemicals to be targeted in this particular circumstance has not yet been decided; it will depend upon decisions by ANZECC/ARMCANZ and the outcomes of the negotiation process set out in Section 2.7.1 of the OCP Plan.
2.3 The OCP container should be considered in the management plan. [Nahrel Dallywater]	Contaminated containers come within the scope of the OCP Plan. Also Avcare has a farm chemicals container management program.
2.3 The pole butt issue should be addressed in the management plan; livestock residues are a concern that should not be ignored. [Geoff Harcombe]	This will need further discussion. Other mechanisms may exist to handle the pole butt issue. The SWMG (in agreement with the NAB) decided not to include pole butts in the Proposed OCP Plan submitted to ANZECC.
2.3 How secure are the sites of the (cattle tick dip) scooping mounds? [Sarah Moles]	In practice most of the sites are not secure, but authorities such as NSW Agriculture are making progress with this matter.
2.3.1 Are contaminated equipment and containers within the scope of the plan? [Adrian Lewis]	Containers, yes. Equipment would be included if it were contaminated to greater than 50 mg/kg and could not be cleaned.
2.3.1 Will the scope include the soil from a spill site or from the leakage from a stored container? [Christopher Stebbing]	The absorbent materials from a spill are included in the scope. More detailed advice on how to deal with materials spilled from containers will need to be developed for the implementation of Section 3.3.
2.3.1 Where contamination has occurred through deliberate treatment using OCPs, it should not be included in the scope, but accidental contamination should be in the scope. [Tony Britt] I suggest 2.3.1 include a footnote to effect Tony Britt's comment. [Bob Handby] Soil placed in a container as a result of a clean-up could be treated along with OCPs. [Jean Meaklim]	Under Section 2.3.1, spilled materials are included in the OCP Plan. However, contamination by deliberate treatment would normally be regarded as a contaminated site issue and outside the scope of the Plan.

Community Comments	OCP Consultation Panel Responses
<p>2.3.2 OCP dip sites are less common than arsenic dip sites. Under QA (quality assurance) system, farmers will be examining their properties for contamination from areas such as dip sites. QA system includes preventative measures such as fencing off. [John Andre]</p> <p>There are close connections with QA systems. [Mike Penhall]</p>	<p>Noted and agreed.</p>
<p>2.3.2, 2.3.3 Where the Plan refers to contents of cattle tick dips, does it only mean contents which are OCPs? [Roger Toffolon]</p> <p>Dip sites are so many and there is not enough money to deal with these. As not doing any harm – leave alone. [Ray Macnamara]</p> <p><i>[continued from previous page]</i></p> <p>Most of the dips in NSW do not have liquid OCPs in them, so do not need to be included in the plan. Scooping mounds should be dealt with as contaminated soil (1000-3000 ppm). [Philippa Curran]</p> <p>The Queensland contaminated sites register includes cattle dips. People do not have to do anything unless the land is required for a more sensitive use; they must manage the site. [Dagogo Ibiebele]</p> <p>Some old dip sites are in urban areas; perhaps these need to be considered differently, as the identity of some has been lost. [John Armbruster]</p> <p>I believe scooping mounds should come out as they are covered by contaminated soil provisions. Leaving them in complicates the legislative process. [Jim Straker]</p> <p>As part of management plans for contaminated sites, all aspects of the remediation of the sites is considered, so I can't see any logical reason why scooping mounds should be identified separately. Scooping mounds are misrepresented in the sense that they can sometimes be a pit. The point is that these things should be managed holistically – there is a range of aspects which need to be managed in a dip site. I see no distinction between scooping mounds and other contaminated soils. I don't think scooping</p>	<p>The NAB recommended that the Proposed OCP Plan to be submitted to ANZECC contain a detailed guidance note on OCPs and cattle tick dip sites. However, the SWMG excised this guidance note prior to the Proposed Plan being forwarded to ANZECC, as a result of strong opposition from NSW Agriculture. The plan approved in principle by ANZECC thus did not include such a</p> <p><i>[continued from previous page]</i></p> <p>guidance note. NAB and SWMG have liaised with NSW Agriculture to try to ensure maximum consistency between NSW Agriculture's policy on managing dip sites and the OCP Plan. Complete convergence was not reached. The matter continues to be handled (in NSW) by NSW Agriculture.</p>

Community Comments	OCP Consultation Panel Responses
<p>mounds should be included in this plan at all – they should be dealt with by other ANZECC processes. [Roger Toffolon]</p> <p>I agree – don't see why scooping mounds should be included in the OCP Plan. [Bob Barwell]</p> <p>I am very uncomfortable with the inclusion of scooping mounds – it opens up another dimension – it is very hard to define the transitional point between scooping mounds and contaminated land – where does one draw the line? Scooping mounds really belong under a different plan – this plan needs to be limited to chemicals.</p> <p>I am concerned because in NSW the landholder is responsible for contaminated dips – inclusion of scooping mounds in the plan will be likely to turn these people off. [Michael Nicholls]</p> <p><i>[continued from previous page]</i></p> <p>I see two ways of dealing with scooping mound issue:</p> <p>(1) define scooping mounds in a way that limits what is included, or</p> <p>(2) quantify what needs to be dealt with – put to Ministers separately costed components then let them decide what they think is affordable. [Ian Coleman]</p> <p>It might deter holders from declaring holdings if scooping mounds are also included and they have large numbers on their properties – this may make the problem worse. [Roger van Cornewal]</p> <p>By definition, scooping mounds must be collectable to be included. Perhaps an upper limit on the size of scooping mounds to be covered by the plan is needed. [Robyn Russell]</p> <p>The main scooping mounds are the clearance dips on the border of Queensland and NSW. Dip sites and scooping mounds should not be in the plan. [Ray Macnamara]</p> <p>You need to identify which dips used OCPs, then low level contaminated dips should be dealt with as contaminated soil, while high concentration scooping mounds should be included in this plan.</p>	<p><i>[see end of previous page]</i></p>

Community Comments	OCP Consultation Panel Responses
<p>[Craig Darlington]</p> <p>At what level does a scooping mound become a contaminated soil? I believe that scooping mounds should not be included, as leaching may have occurred. [Leon Huinck]</p> <p>It is possible to draw a comparison between other heavily contaminated sites so the focus on scooping mounds could be too specific. Other sites could include OCP storage sheds. [David Judson]</p> <p>Specific targets like scooping mounds should be included but not other broad categories. [Adrian Lewis]</p> <p>A definition of a scooping mound should be included. [Ian Manley]</p> <p>Where footnote 4 says “the agency will develop guidance notes”, surely there should be a national approach, with jurisdictions to add their specific information. [Nigel Green]</p> <p>There is no need to clean up land until there is a change in land use. I am concerned as a government representative about the increased cost of including cattle tick dips and scooping [continued from previous page]</p> <p>mounds in this plan, especially when the land is managed appropriately under contaminated land legislation. [David Miles]</p> <p>I am worried that people are trying to hide scooping mounds – all exclusions may need to be put into the plan. There is a need to identify linkages – between components – there needs to be integrated management – urban/suburban as well as rural. [Peter Waterman]</p>	<p>[see end of previous page]</p>
<p>2.3.2 The Human Health Criteria level is 200 ppm for DDT. [Philippa Curran]</p>	<p>200 ppm DDT has been proposed by some jurisdictions; however, this level is far above the USA limit of 2 ppm for the most sensitive use.</p>
<p>2.3.2 In Queensland contaminated land is dealt with on change of ownership or use. [Ray Macnamara]</p>	<p>This is a common procedure in most jurisdictions.</p>
<p>2.3.2 In NSW, schools and houses are still located next to dips; 36 houses are on old dips. [Craig Darlington]</p>	<p>NSW Agriculture advises that it is no longer permissible to build houses on dip sites in NSW. However, there are recognised problems where houses have been built on or near dip sites.</p>

Community Comments	OCP Consultation Panel Responses
2.3.2 There is no requirement to clean up dip sites if not causing a nuisance to anyone. [Jim Straker]	Noted.
2.3.2 There should be a 200m buffer zone between any new development and a dip site. [Wayne Thompson]	The 200m buffer zone is a recommendation for councils in NSW to use as a guideline to investigate the effect on any new development.
2.3.2 If the technology is not there to deal with this, how do you clean up these sites? [Roy Smith]	Some technology is available and others are undergoing trials; however, in some circumstances, clean-up may be very difficult and/or very expensive.
2.3.2 Are you aware of the Geo2 Ltd technology being developed together with NSW Agriculture? [Paul Smith]	Yes.
2.3.3 Can treatment operators deal with scooping mounds readily? There will be large volumes. [Peter Wong] Can destruction technologies treat scooping mounds with OCPs? [Philippa Curran]	Yes. The Environment Management Industry Association of Australia has reported that existing technologies, such as Eco Logic, can effectively treat these wastes, albeit at significant cost (several thousand dollars per tonne). The Panel notes that Australian Defence Industries has developed a soil treatment process in New Zealand. It might provide a cheaper solution for material such as that in scooping mounds. However, note that scooping mounds are now not covered by the OCP Plan, following removal by the SWMG from the Proposed Plan forwarded to ANZECC of provisions addressing these (see note on this on page 13 of this report).
2.3.3 If highly contaminated scooping mounds are not included in this plan, then people could dispose of their OCP wastes on dip sites and thus avoid handing them in to collection points. [Craig Darlington]	Concern noted, though such an action would be contrary to the provisions of the OCP Plan. While scooping mounds have been excluded from the OCP Plan, the NAB and SWMG have been liaising with NSW Agriculture to try to ensure that they are dealt with appropriately.
2.3.3 Cattlecare and Flockcare say don't store OCPs on farms. We want contaminated soils managed in a manner which minimises risk. There are a number of strategies that we could use – eg we could have cattle operators not feed cattle off the ground. Some areas that have been contaminated would need to be quarantined. We provide written advice on these matters. [Bob Barwell]	Noted.
2.3.3 Queensland has a plan and depending on who you talk to, you get conflicting advice on how to manage scooping mounds. [Bob Barwell]	Noted.
2.3.3 There is also a problem with soil under drums that have leaked in sheds. [Michael Nicholls]	Agreed.

Community Comments	OCP Consultation Panel Responses
<p>2.3.3 Producer groups eg beef industry have included land remediation in their programs, so they appear likely to end up paying for this. [Norm Blackman]</p>	<p>Noted.</p>
<p>2.3.3 We must deal with scooping mounds, as they are more bio-available than the stuff in containers. [Peter McDowall]</p>	<p>Agreed, the issue will not go away – the task is to find the most effective way of dealing with it.</p>
<p>2.3.3 Mention of cleaning up contaminated sites will scare people off because of the costs and the magnitude of the problem. [Mike Darby]</p>	<p>Contaminated soil is outside the scope of plan.</p>
<p>2.3.3 Real estate agents in city areas are reluctant to report contamination because of resultant depreciation of land values. Could inclusion of scooping mounds in the plan deter farmers from reporting for similar reasons? [Peter Wong]</p>	<p>The plan places no obligation on holders to report. This matter would apply mainly to the sale of properties, and there are likely to be obligations on the vendor to report in those circumstances. In any case, scooping mounds have now been excluded from the OCP Plan.</p>
<p>2.3.3 We need to look at the OCP issue in an integrated way – ultimately the aim is to stop this stuff getting into environment. While it is all very well to deal with the stuff in drums, we also need to prevent the stuff on the land from causing environmental problems. Therefore, the plan should be inclusive rather than exclusive and should be explicit about all exclusions such as house sites treated with termiticides. [Peter Waterman]</p>	<p>While this is a good point, ANZECC has directed that the OCP Plan should focus on stored chemicals; consequently, contaminated sites (including scooping mounds) are not covered. Nevertheless, the NAB is attempting to ensure that these matters are not addressed in isolation from each other; for example, we have liaised with NSW Agriculture over the management of cattle tick dip sites in northern NSW.</p>
<p>2.3.3 This plan is only trying to address one part of the problem – contaminated sites are being dealt with elsewhere, so if scooping mounds are better regarded as contaminated soils, they should be addressed through that program. However, if scooping mounds pose a greater risk and their inclusion would not jeopardise the overall plan, then this should be flagged as an option and Ministers can then decide on how they should be addressed. [Ian Coleman]</p>	<p>Agreed that the issue is for scooping mounds to be dealt with effectively and to finding the best mechanism for achieving that outcome. ANZECC Ministers have decided that scooping mounds should not come under the OCP Plan.</p>
<p>2.3.3 What is the effectiveness of current contaminated soil legislation?</p> <p>What is the effectiveness of contaminated sites legislation in States other than NSW?</p> <p>Treating dips in the ACT as contaminated land is not working. [Craig Darlington]</p>	<p>Because contaminated land is outside the scope of this plan, the Panel has not been in a position to examine this question in detail. There are certainly a variety of opinions on this subject.</p> <p>Opinion noted.</p>
<p>2.3.3 A fence will stop cows but not chemicals. [Miles Blake]</p>	<p>Noted.</p>

Community Comments	OCP Consultation Panel Responses
<p>2.3.4 In potato growing areas, there is a strong likelihood that fertiliser mixed with dieldrin will be handed in. This will be difficult to handle. [Tony Britt]</p> <p>Also fertiliser with lindane. [Jim Stranger]</p>	Noted.
<p>2.3.6 Another major issue is OCP contaminated timber framing used for concrete formwork. Once this is no longer needed, it is thrown away without any precautions.</p> <p>During use, there is the further issue of OH&S, in that workers are not washing hands once they have handled these timbers. [Rod Curtis]</p>	Noted.
<p>2.3/2.4 If contaminated land is a demonstrated health or environment risk, then it must be dealt with at the time. [Trevor Lloyd]</p>	Opinion noted.
<p>2.4 In relation to certification of organic farms, in cases where contamination was found from dip sites, the land use pattern was altered to tree plantation. [Tim Marshall]</p>	Noted.
<p>2.4 Will the contaminated sites issue deflect funding from the major issue which is 'chemicals in containers'. [Max Harvey]</p>	The Plan's intention is to avoid this, and focus on more concentrated chemicals.
<p>2.4 What is the state of the contaminated land register, especially for dip sites? [Jamie Cupples]</p>	<p>The Queensland Department of Environment's view is that the register is generally good, but not complete for dip sites as some farmers have not reported them. Records have started to be put on a Geographic Information System. The Contaminated Sites Register was split into two registers in July 1998 following the cessation of the Contaminated Lands Act and incorporation of similar provisions into the Environment Protection Act. The Environmental Management Register contains information on previous land uses which are listed as Notifiable Activities in the EP Act. Such uses may cause land to be contaminated but as there have been no investigations at this stage, contamination can not be proven. The Contaminated Land Register lists sites that have been investigated and have been shown to be contaminated to an extent that remediation is required before further use.</p>
<p>2.4 Should landfills be included in the scope because of past practices for disposal of hazardous chemicals? [John Brennan]</p>	<p>Landfills are regarded as contaminated sites and therefore excluded from the scope of the OCP Plan. Appendix B to the Plan, however, provides guidance on the landfilling of <u>non</u>-scheduled OCP waste.</p>

Community Comments	OCP Consultation Panel Responses
<p>2.5.1 Research and Development organisations (eg. Cattle Council and Grains Council) have a vested interest in ensuring no further contamination from OCPs. They should be prepared to offer substantial funds. [Unidentified, Merredin workshop]</p>	<p>These organisations should be involved in negotiation of a stakeholder agreement, as outlined in Section 2.7.1 of the OCP Plan.</p>
<p>2.5.1 This is not the forum for discussing funding and who is actually going to pay. There needs to be a different forum to have all stakeholders discuss levels of responsibility and to negotiate who pays. [Unidentified, Merredin workshop]</p>	<p>Funding details will be given more attention at a later stage (see Section 2.7.1 of the OCP Plan).</p>
<p>2.5.1 Who are the stakeholders? [Dennis Long]</p>	<p>Stakeholders are considered to be all spheres of government, and industry as defined in footnote 5 to the plan. (NB: this is a smaller group of stakeholders than those involved in the process of negotiating the plan as a whole.)</p>
<p>2.5.1 Are you envisaging a levy on farmers who return this material? [Dennis Long]</p>	<p>No.</p>
<p>2.5.1 Need an incentive, not a levy. [Dennis Long]</p>	<p>Opinion noted, but a financial incentive seems unlikely. Reducing risk of contamination (which may result in financial loss) is an incentive in itself.</p>
<p>2.5.1 The effect is not only environmental; there are also human health issues – can we get funding from the health budget?</p> <p>The people who are holding the chemicals – industry made the profit, perhaps some responsibility for industry.</p> <p>Government collected sales tax – they also benefited and should take some responsibility. [Craig Darlington]</p>	<p>Any funding from governments is likely to be the result of a whole-of-government decision. The split of funding responsibility between governments and industry will be determined in the negotiation process.</p>
<p>2.5.1 It is not just industry and government – what contribution can the farmers make? They caused the problem (the polluter), so should contribute to cleaning up environment/farms etc. [Dagogo Ibiebele]</p> <p>ANZECC and ARMCANZ are only going to put money on the table on the strength of your arguments, so the stronger the argument the better the chance. If the user-pays principle is applied, graziers who have been in drought for years will buckle. We are depending on you on the strength of your submission for money on the table. [Miles Blake]</p>	<p>Contributions by farmers and other holders are likely to be in kind, eg securing the waste and transporting to collection points, rather than financial.</p>

Community Comments	OCP Consultation Panel Responses
<p>2.5.1 What about compensation for farmers? [Trenchard Smith]</p> <p>Farmers should get due compensation for the value of their chemical. [Rod Schultz]</p> <p>Because OCPs have been banned for 10 years, I do not believe that holders will be concerned about compensation. [Peter Amiet]</p> <p>I agree that people will not want compensation, nor will they pay to bring the materials in. [Bernie Milford]</p>	<p>Compensation for holders is not envisaged, nor are individual holders expected to pay to hand materials in.</p>
<p>2.5.1 We need a user-pays system. [Rob Curtis]</p> <p>Users may pay in kind; for instance a farmer may pay in petrol by bringing materials to the collection point. [David Miles]</p>	<p>Any collection program is unlikely to be strictly user-pays, but in-kind contributions will be vital to producing an affordable outcome.</p>
<p>2.5.1 Take out of council funds, through rates paid. [Trenchard Smith]</p>	<p>Opinion noted, although we heard no support for this position from local government.</p>
<p>2.5.1 Farming industry bodies will accept responsibility for communications with growers, members and non-members. We would expect cooperation from Avcare and resellers; however, destruction is a community issue and government rather than the farming industry should pay. [Jamie Cupples]</p>	<p>Opinion noted; this is a widely-held view.</p>
<p>2.5.1 Local government should provide in-kind resources and funding should be obtained from other spheres of government. [Sue Rowlinson]</p>	<p>This is a likely model.</p>
<p>2.5.1 If the program is too expensive, you will get a knock-back, if there is sufficient in-kind support then you would expect to get funding from government. [John Ready]</p>	<p>Agreed, the sharing of effort and burden will be important in reaching a successful outcome.</p>
<p>2.5.1 Have you discussed with DPIE the collection they did a few years ago? [Jamie Cupples]</p>	<p>The information is in the collection document.</p>
<p>2.5.1 When going to government there is a need to use a cost/benefit approach. The Panel needs hard data on the costs of not taking action. [David Miles]</p>	<p>Agreed.</p>
<p>2.5.1 When a ban was put in place some farmers stocked up on those chemicals. I support as many incentives as possible to ensure the chemicals are handed in and not dumped. [Peter Valentine]</p>	<p>Opinion noted.</p>
<p>2.5.1 I suggest a new levy for the future management of unwanted chemicals. This would apply to all hazardous chemicals. [Wesley Hazell]</p>	<p>There are other examples of this, such as container management. There is, however, some opposition to using a levy on existing registered chemicals to deal with problems associated with unregistered chemicals.</p>

Community Comments	OCP Consultation Panel Responses
2.5.1 Are you assured that you will get enough support/financial backing to do this? [John Armbruster]	This will be ascertained through the negotiation under Section 2.7.1, which is now occurring following ANZECC's in-principle endorsement of the Plan.
2.5.1 Collections is a critical issue which should be shared between Commonwealth, State, Territory, and Local governments.	Agreed.
2.5.1 Regionally-driven drum collection. There is a levy on drums. [Jamie Cupples]	Levies are fine for existing products. It is very difficult to levy deregistered products.
2.6 Do States have to implement this plan? Are you sure it will be implemented, once the State Ministers have signed off through ANZECC? It will be hard to wriggle out of, would you say? [Steve Benzie]	When ANZECC endorses this plan, each jurisdiction is in effect committing itself to the plan. However, there is no legal obligation to implement. We hope so – otherwise we will have put in a lot of effort without securing an outcome. It must be acknowledged, however, that funding decisions will be made as whole-of-government decision rather than by individual Ministers.
2.6 There needs to be consistency with a State statutory instrument – the plan needs to be introduced as a National Environment Protection Measure (NEPM). [Dagogo Ibiebele]	Pursuit of the NEPM option would be likely to lead to serious delays in the implementation of this plan.
2.6 How will coordination of OCP collections occur and would the lead agency be Environment Australia? How will coordination flow from a national through state to regional level? [Gary Newman]	Coordination would occur and be defined through Ministerial agreement. Obviously this will require considerable further work once agreement to collections is reached.
2.6 The National Food Standard (ANZFA) is a good example to look at and seek direction from. [Garry Newman]	To be considered, along with the Fresh Food Approach concept being adopted by some retail chains (eg the Woolworths program). This program is reliant on strict quality assurance (QA) standards in terms of chemical residues and food hygiene.

Section 3: Collections

Community Comments	OCP Consultation Panel Responses
3 Questions raised at Merredin included: ?? how do we define the problem?, ?? how do we know how much?, ?? why the difference in costs per tonne for collection?, (referring to \$4K Queensland and \$7K WA, figure 3 NCSDS Discussion Paper) ?? what do these stated costs include?, ?? where is it stored and how do we know?, ?? is a collection system established? ?? will a consistent system be established across the country?	These questions were raised at other workshops, too. Estimates of the scale and cost of management and destruction were in the NCSDS Discussion Paper. Work to further refine the estimates is proceeding.

Community Comments	OCP Consultation Panel Responses
<p>3 How much effort is required to deal with OCPs? – Management efforts should not be isolated just to OCPs – as there is unlikely to be much around, other unwanted pesticides should be included, too. [Gerry Wood]</p>	<p>The Panel is unable to put a definite figure on it, but believes there are substantial amounts out there. Further survey work may be considered in special circumstances.</p>
<p>3 There are roughly 100,000 people in the Darwin region and this is more than half of the entire NT population, so does the size of the holdings justify collection? [Gerry Wood]</p>	<p>Yes – while the population may be small, the Panel believes that there are substantial amounts of OCPs there, which is the significant matter.</p>
<p>3 Most clearing sales found OCPs and people were keen to get them. [Unidentified, Merredin workshop]</p>	<p>Noted. The Panel has heard this at other venues.</p>
<p>3.1 There is a need for contributions from farmers, shires and regions to gather information on OCP holdings. There are existing programs to undertake this information gathering process. [Unidentified, Merredin workshop]</p>	<p>After many years of trying we still have only rudimentary knowledge of holdings – we feel that we should press on and carry out the program rather than spend much more effort on this.</p>
<p>3.1 You need to involve all stakeholders in developing a collection program – face-to-face meetings between agencies and holders for education and information dissemination. [Peter Wahlsten]</p>	<p>Noted.</p>
<p>3.1 The Lake Grace/Koorda region has 400-600 farms with extension officers in agriculture who visit every farm. It would be achievable to visit every farm and identify unwanted chemicals. [Peter Wahlsten]</p> <p>While on the farm for the purposes of identifying stored chemicals, with proper equipment they could pick up OCPs at the same time. [Peter DiMarco]</p> <p>We could not commit huge resources to this program but if an agriculture extension officer came to a farm for another reason then chemical management could be an add-on to this function. Even then it would be better to make contact with farmers and target specific farms for chemical management procedures. [Peter Rutherford]</p> <p>Transport industries should be involved – get trained people to visit farms and take their OCPs to collection points. [Sue Nixon]</p>	<p>This option may be appropriate for some regions, but may prove too resource intensive for others.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 Western Australian Farmers Federation (WAFF) could be involved in a program to meet farmers face to face to determine the problem and facilitate chemical management. [Peter Wahlsten]</p> <p>With 13000 registered primary producers, face-to-face meetings are impractical. I support Peter Rutherford in writing to farmers first to target resources to problem areas. [Iain Chalmers]</p> <p>In the case of the wheat belt with broad acre farming, face-to-face meeting is possible – better done with letters first. Different strategies will be needed for other areas like intensive farming in Bunbury region. [Peter Wahlsten]</p>	<p>Different views noted and implementation at the local level will decide actions to be taken.</p>
<p>3.1 Each region could employ one person to manage the process. [Rob Meney]</p>	<p>Suggestion noted.</p>
<p>3.1 Service clubs conduct collection of medicines which may be a model for the collection process. However, the program should be targeted to specific chemicals. [David Keamy]</p>	<p>With appropriate training such groups may be able to participate. The level of support for such an approach varied widely between workshops, no doubt reflecting regional differences and past experiences.</p>
<p>3.1 Promote improvising to use existing resources and supplement programs to meet face-to-face with all farmers. [David Keamy]</p>	<p>Agreed.</p>
<p>3.1 The Country Women’s Association (CWA) WA is a State-wide body which has a well established network and communication lines through newsletters. CWA has sufficient influence to have a positive effect on a chemical collection program. I support the use of community service groups which also have well established networks. [Christine Lethlean-Baxter]</p>	<p>We believe the CWA will have an important role to play in the implementation of the OCP Plan. The use of established and supportive networks will be an essential part of a successful collections program.</p>
<p>3.1 Each shire councillor probably represents about 20-30 farmers in their ward, and could meet each face-to-face. [Stephen Crooks (Bruce Rock)]</p>	<p>Noted.</p>
<p>3.1 Whoever is involved in face-to-face meetings should be appropriately trained. [Peter Wahlsten]</p>	<p>Agreed.</p>
<p>3.1 Does all this solve the problem of actually collecting the chemicals? How do we assess whether we can afford this level of operation? Need to assess national cost and work backwards. [Peter DiMarco]</p>	<p>Stakeholders (industry, all spheres of government, and community groups) will determine the levels of resources required and to be provided before a national collection scheme commences.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 I strongly believe that groups should be involved in networking and communication only, with properly trained personnel handling chemicals. [Rob Meney]</p> <p>Assuming there was funding, I have a preference for trained officers collecting chemicals safely rather than farmers driving in. [Elaine Attwood]</p>	<p>Trained personnel travelling to all holders is unlikely to be affordable on a national scale, but may be funded locally in some places.</p>
<p>3.1 Why this apparent concern over farmers transporting chemicals? If the containers are corroded, the farmer would be smart enough to enclose in secure container. [Gavin Dougherty]</p>	<p>Agreed that, with helpful advice, many holders can manage.</p>
<p>3.1 Government role should initially be coordination and support in preparing information and facilitating the establishment of networks. We should utilise existing work programs to visit farms for the purpose of surveying unwanted chemicals. Additional funding needed for the program would be a whole-of-government issue which would be determined at Cabinet level. [Peter Rutherford]</p>	<p>Noted.</p>
<p>3.1 I agree that funding for implementation is a whole-of-government issue, and the role of peak bodies is to lobby government to ensure funds are made available. [Rob Meney]</p>	<p>Agreed. It is likely that Governments will have to provide substantial funding, though the OCP Plan (section 2.7.1) makes provision for other stakeholders to be involved either to contribute funds or to provide services in kind.</p>
<p>3.1 In this area (Merredin) there is one town per shire – there should be one collection point per shire. [Stephen Crooks]</p>	<p>Noted.</p>
<p>3.1 You should refer to McGuffog’s ‘operation clean rinse’ program to determine existing infrastructure. [Iain Chalmers]</p>	<p>We have that report.</p>
<p>3.1 I suggest hiring a PR person for an awareness program to highlight program activity – there is a need for a strategy to include media in information distribution in an organised fashion. You could use existing staff in the process, eg NAB members. [Peter DiMarco]</p>	<p>Noted, although NAB members are unlikely to be used directly in the implementation program.</p>
<p>3.1 We should be using the existing expertise in a particular region like rural merchandisers. [Mike Penhall]</p>	<p>Sections 2.7.1 and 3.1 seek to involve all stakeholders to access a range of resources and expertise.</p>
<p>3.1 Does the particular chemical industry which manufactured OCPs have a responsibility? [Barbara Murrum]</p>	<p>In a moral sense, but we suspect not legally as manufacture was permitted by government. This has not been tested in a court, though. Many companies involved in the production/distribution chain for these chemicals no longer exist.</p>
<p>3.1 If the community wants a particular style of collection they will instruct council so. [Des Collins]</p>	<p>They may do so, bearing in mind the possible costs.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 In NSW, where people take this regional approach and are prepared to accept the NSW Government taking a role, regional waste plans funded by State Government will be developed. It is important that this happens – in Eurobodalla, there has been a problem where nobody would take containers away because the State Government was not involved. Such a regional approach would overcome these sorts of problems. [Paul May]</p>	<p>Where regional approaches are able to be adopted they are likely to assist with the effective implementation of the OCP Plan.</p>
<p>3.1 I Think local government would go along with short-term storage if the EPA were to take over, but would have to satisfy WorkCover. [Gary Smith]</p>	<p>This model has been used previously – notably in Victoria and SA.</p>
<p>3.1 Fixed facilities aren't needed, as OCPs are a temporary problem. I don't really want to be accepting contaminated waste at my landfill site – this should be the responsibility of industry – I don't want to be in the position of setting up something and becoming responsible for something that I didn't cause in the first place – so I like the idea of a temporary facility. [Mike Thompson]</p>	<p>Despite expressions of concern, most responses from local government were generally positive. Councils were keen to establish, however, that they not hold the waste for long periods.</p>
<p>3.1 Are you saying that urban councils eg Queanbeyan will have to pick up the can for surrounding rural councils eg Yarrowlumla, though the rural councils are the larger holders of OCPs? [Phil Hansen]</p>	<p>For regional approaches to work they will clearly have to operate on the basis of cooperation, mutual respect and – where appropriate – shared costs.</p>
<p>3.1 Mutual trust between parties is essential – if anyone has any fear that they are going to be left with the problem, or that others aren't going to play their part, then the whole plan will fall apart. [Michael Nicholls]</p>	<p>Agreed. Building this trust will be an important part of implementation.</p>
<p>3.1 You cannot expect local authorities to do the collection for nothing. [Mark Hoogsteyns]</p> <p>This is not a local government issue – local government would be doing this for the Commonwealth – local government would participate in that program, but would need funding. [Gerry Wood]</p>	<p>Opinions noted, although many councils expressed a willingness to make in-kind resources available. In general, we do not expect local councils to be paid for their participation in a collections program.</p>
<p>3.1 Most of the costs should go back to local councils and Department of Primary Industries (DPI), with local councils to send out property notices to people in their jurisdictions, and DPI to coordinate collections. [Roger Kelly]</p>	<p>Opinion noted.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 There will be a problem, especially with rural areas in the NT, with hoarding. It is all very fine talking about different groups collecting chemicals, but ultimately it is going to come down to the NT Government – it has to police implementation and make funds available for councils to implement the plan – just asking people to hand in their OCPs is not going to work. [Roger Kelly]</p>	<p>Leadership by government and government agencies will be important.</p>
<p>3.1 Like people with guns, people with OCPs are going to be reluctant to hand over the stuff if at all – therefore this must be made as easy as possible. [Carol Carttling]</p>	<p>Agreed.</p>
<p>3.1 Tennant Creek collection turned up 20 kg of lindane, 20 L of 2,4,5-T plus other chemicals to a total of a few tens of kilograms. [Unidentified, Darwin]</p>	<p>Interesting data, to be followed up during implementation.</p>
<p>3.1 It seems that the most difficult stuff is that in the remote rural areas – it is easier to get the urban and fringe rural stuff. I suggest getting one of the Landcare groups from each of the key regions to ask their members – go through a pilot stage and get them find out what is to be dealt with. [Jayne Weepers]</p>	<p>A useful way of conducting a survey.</p>
<p>3.1 Unwanted chemicals are a whole-of-government and whole-of-community problem with shared responsibility. [Unidentified, Bunbury workshop]</p>	<p>Agreed. The OCP Waste Management Plan takes this position, which was widely supported at consultative forums and workshops.</p>
<p>3.1 Waste management levy mechanism could be considered at a State or local level. [Unidentified, Bunbury workshop]</p> <p>Urban levy monies will be targeted at recycling but it is uncertain whether this money presently raised could be used at the moment for chemical collection. [Unidentified, Bunbury workshop]</p>	<p>For consideration by jurisdictions.</p> <p>Some waste disposal levy monies (eg in Victoria) are used in part for chemical collections, but extra funding would be required for an OCP collection.</p>
<p>3.1 Use industry distribution network as they could take back chemicals. [Unidentified, Bunbury workshop]</p>	<p>Some resellers have indicated a preparedness to accept OCPs for storage, but these are in a minority.</p>
<p>3.1 Irrespective of how a program is managed, whether at a shire, regional, State or national level, there needs to be appropriate resourcing (staff, infrastructure, money). [Unidentified, Bunbury workshop]</p> <p>State government will help where it can with technical help, infrastructure, but not much money. [Unidentified, Bunbury workshop]</p>	<p>The form and level of stakeholder contributions will be determined through the negotiation process in Section 2.7.1.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 Industry believes the issue is a historical problem which needs the involvement of all stakeholders and uses their expertise – industry is not offering much money. Some believe the chemical industry should contribute some money as the State has funded in the past. [Unidentified, Bunbury workshop]</p>	<p>If insufficient money is available to supplement ‘in kind’ resourcing, the OCP Plan may not be implemented.</p>
<p>3.1 In WA, there are 12 councils in a local government regional waste management group. They have in mind the interests of farmers, and have responsibility for waste management. There needs to be good planning for infrastructure and empowerment of farmers to act. Councils can help with collections but not destruction. [Unidentified, Bunbury workshop]</p>	<p>Noted and agreed.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 I am involved with the Australian Capital Region Development Council, which is a move to try to bring ACT and local government in the region together. There have been some early approaches to joint waste management. [Gratton Wilson]</p> <p>I chair the Integrated Waste Management Steering Committee, which involves cooperative arrangements between 16 NSW councils (covering Bega-Eurobodalla, Bombala, Goulburn, Young, and Snowy Mountains) and the ACT. It was formed because in the south-eastern region of NSW, many problems are associated with economies of scale and it was realised that there may be opportunities for rationalisation of some things eg waste management. The Committee is to finish up at the end of the year, but is likely to be followed by a trial waste board. Cooperative arrangements have gained acceptance and it is recognised that the ACT can provide councils with expertise on waste management. If a trial waste board comes into being, it would be a very suitable body to coordinate these sorts of programs. [Paul May]</p> <p>This steering committee is a regional leaders forum, underpinned by key political figures (including the ACT Chief Minister) and meets every four months to consider resource underpinning, linkage to Cooperative Research Centres and industry relationships. [Peter Waterman]</p> <p>ACT policy is to look at whether these facilities are not available in other States – then we're willing to cooperate. [Tony Hodgson]</p> <p>[It was reported at the Horsham workshop that a regional committee has been formed to oversee waste management issues for a particular area.]</p> <p>These regional areas have shown positive results for container management and in fact the Hindmarsh region has a paid and trained officer to undertake this program. [Gary Newman]</p> <p>These regional areas provide a good framework in which to develop collection programs. [Ian Manley]</p> <p>I strongly support the regional waste management processes. [Bob Handby]</p>	<p>These existing and strengthening regional (including NSW/ACT cross border) arrangements appear to provide a firm basis for consideration of regional approaches to the implementation of the OCP Plan.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 Queanbeyan City Council has had a relationship with ACT Government over a number of years, but we have found more trouble disposing of half a litre of OCPs in the ACT than 10,000 tonnes of solid waste – numerous analyses and approvals are required. While the political will is there at the regional level, quite a few bureaucratic impediments need to be sorted out. There needs to be 100% political support for this to succeed. [Mike Thompson]</p>	<p>Endorsement of the <i>OCP Waste Management Plan</i>, together with endorsement and resourcing of a collections program, by government will be an indicant of political will.</p>
<p>3.1 Emergency Services said that their role is to combat spillages. They could not get involved in the collection because that was not their business. [Unidentified, Bunbury]</p>	<p>Information noted. However, it seems to the Panel that Emergency Services advice should, at the very least, be sought on the nature of the collection processes as a preventative measure.</p>
<p>3.1 WA Health Department can provide expertise and advice. [Unidentified, Bunbury workshop]</p>	<p>Any such assistance will be valuable.</p>
<p>3.1 Councils can provide collection point sites and could combine with other councils for a regional approach. No money available. [Unidentified, Bunbury workshop]</p>	<p>Noted.</p>
<p>3.1 Local government needs to establish clear policy. [Evelyn Brand]</p>	<p>Agreed, the role of all stakeholders needs to be clear for effective implementation.</p>
<p>3.1 The container levy may set a precedent. [Nahrel Dallywater]</p>	<p>For consideration – particularly for possible future or ongoing collections.</p>
<p>3.1 There needs to be full-time staffing at collection points. [Bob McMiles]</p>	<p>Agreed that material should not be received at unstaffed collection points, but in many cases it may be that there is insufficient waste to justify full-time staffing. Collection points must be secure when staff are not present.</p>
<p>3.1 The capital costs of each option are not obvious and the perception that ongoing storage is more expensive could be misplaced. Set-up costs will be similar – it is the ongoing component which will vary. [Peter Rutherford]</p>	<p>Ongoing infrastructure may require more controlled and expensive buildings to meet regulatory requirements – eg works approvals, stringent licensing, local agreement for specific locations. Section 5.8 is relevant here.</p>
<p>3.1 Industry should not shirk its responsibilities - funding or otherwise. [Sandy Lyons]</p> <p>Responsibility should be shared amongst all stakeholders. [Cameron Rogers]</p> <p>Future management is clearly an industry responsibility, particularly with their understanding of the issues. [Steve Benzie]</p> <p>The target within industry should be focussed on those sectors who produced OCPs – this needs careful consideration. [Cameron Rogers]</p>	<p>All stakeholders will need to be involved.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 Shires and community should take control of the front-end of the collection process. [Unidentified, Merredin]</p> <p>Involve the community at the outset, to ensure that the community has the opportunity to be fully involved in the collection program. [Trevor Ranford]</p>	Strong local involvement in the 'front end' will be valuable.
<p>3.1 Are we going to bring together the peak bodies to progress this issue? [Unidentified, Merredin]</p>	Yes, this is likely to happen in late 1998 or early 1999.
<p>3.1 You could link implementation with other programs which have agricultural officers already at farms to enable inspections for unwanted chemicals. [Roger Robertson]</p>	A useful local option.
<p>3.1 Cooperation between Mt Lofty Ranges Catchment Program, Primary Industry of SA (PISA) and SA EPA and community is excellent. [Tim Marshall]</p> <p>Catchment Boards and other organisations provide a conduit between government and the community. These organisations should be incorporated into the process. [Des Collins]</p>	This may be a good basis to build upon for collections programs.
<p>3.1 The approach needs to be closely examined; it is dependent on the availability of State and local government facilities and resources. [Ross Britton]</p>	Agreed. Many stakeholders will become involved.
<p>3.1 Costs need to be widely shared if this is to work. [Philippa Rowland]</p>	Agreed, both monetary and in-kind costs.
<p>3.1 Councils could provide collection point (ie land). But the agency will need to provide technical assistance. [Brian Crane]</p>	Noted.
<p>3.1 A collection point may not be needed for every council. [Marion Webster; John Howarth]</p>	Regional cooperation could result in such an outcome.
<p>3.1 The north coast has had 3 or 4 chemical clean-out campaigns over last decade. While regarded as quite successful, they still haven't got it all. To be successful, you need to have good accessibility to collection points. It is important that the centre be not too remote, well advertised, staffed reasonable hours with people able to receive the chemicals and give advice. Accessibility is paramount. [Geoff Sullivan]</p>	Agreed. Shared information will be important in implementation of the plan.
<p>3.1 Under the licensing requirements in the NSW Dangerous Goods Act, there is a database for dangerous goods licences known as the 'SKIDS' system. You could tap into database for dangerous goods licensees who have infrastructure in place. [Cormack Dunn]</p>	This could be useful during implementation.

Community Comments	OCP Consultation Panel Responses
<p>3.1 In most agricultural centres, retail outlets have facilities in place with bunding etc. You could get different facilities in a centre to take different chemicals – I think they would be willing to do this, because they are as much a part of this as anyone. So the system is essentially there. I think some councils would also have bunded areas. [Paul Handsaker]</p>	<p>These stores are not considered to be appropriate collection points for safety and environmental reasons, especially because of their locations in towns.</p>
<p>3.1 How much does a store cost? [Cormack Dunn]</p> <p>It cost \$140,000 to set up our facility. [Philip Palmer]</p> <p>It cost \$250,000 for ours – Wagga, Dubbo and Moree – only Wagga and Moree waste licensed – others would need to be. Have segregation facilities, trained staff, licensed vehicles, expertise to handle – could probably do the whole of NSW. [Ivan Diggs]</p>	<p>The Dubbo Rural Lands Board and United Transport Services (UTS) could make an important contribution to the collections process and could become part of the regional plan (but being a commercial operation, UTS would charge). Given the costs of establishing new, purpose-built facilities, it will be necessary to use existing facilities where possible. Many collection points, however, could be established at low cost using the principles outlined in Section 5.8. This is essential if the plan is to be implemented.</p>
<p>3.1 Collections should be user-pays. [Unidentified, Dubbo workshop]</p>	<p>It is generally anticipated that farmers and householders will not be required to pay for collections.</p>
<p>3.1 There is enormous public benefit in having OCPs collected and destroyed. [Greg Markwick]</p>	<p>Agreed.</p>
<p>3.1 National Australian Environmental Pests Managers Association (AEPMA) meeting is being held on 23 July 1997 – one of the agenda items is on facilitating collection from small holders eg householders. [Robyn Holden]</p>	<p>We understand that a proposal was taken to the AEPMA Board and disseminated to the States for discussion as to whether they would be willing to do it on a State wide basis or not.</p>
<p>3.1 I don't see much on providing incentives to deliver, or disincentives not to.</p> <p>I think that a general statement can be built in to make it clear that there will be no penalty on delivery – there is a need to remove any impediments. [Ian Coleman]</p>	<p>The incentive is the removal of risk to the environment and health and risk of potentially economically catastrophic contamination of agricultural produce. Also, clear mechanisms will be established for proper collection and destruction of chemicals which are illegal to use, and, in some places, to hold.</p> <p>The Panel agrees with removing as many impediments as possible.</p>
<p>3.1 In view of limited financial capacity, I suggest offering inducements such as a lottery for delivery (could be cash, holiday, etc). [Peter Grabosky]</p>	<p>This could be of interest to those implementing collections at local/regional level.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 The cost factor for collection and disposal is a major disincentive for appropriate management. In fact, some holders want a buy-back program. There needs to be close scrutiny of the issue to ensure that the desired outcomes of the Plan are achieved. I suggest a levy on all people to spread the cost of OCP management with the message that hazardous chemicals are being removed, just like the gun buy-back. The bottom line will be the cost factor, so a buy-back could be the incentive. [John Brennan]</p> <p>I suggest a buy-back scheme along the lines of the gun buy-back scheme. [Phil Hansen (Queanbeyan City Council)]</p> <p>There has just been a successful buy-back of guns; this could be a good model to follow. [Mark Hoogsteyns]</p> <p>If we can have a buy-back scheme for guns, why not for dieldrin? [Gerry Wood]</p>	<p>Funding mechanisms will be determined through the negotiation process in Section 2.7.1. However, we believe that buy-backs and tax levies are very unlikely to be accepted politically, because of the expense coupled with the fact that OCPs don't have the same public impact as guns. Government is unlikely to fund such a buy-back scheme.</p>
<p>3.1 Have any chemical companies put their hands up to offer cooperation? [Robyn Holden]</p>	<p>There have been offers of cooperation, but not offers to take the lead on funding.</p>
<p>3.1 There is a lack of trust between local and State government – if we don't talk money, I don't think local authorities will be interested in being involved. [Peter Beer]</p>	<p>Opinion noted.</p>
<p>3.1 There is a need to integrate with container management programs – it would be wonderful for the rural community, also help with funding for infrastructure. [John Kent]</p>	<p>Solutions which link and create synergies between programs should be sought.</p>
<p>3.1 Jondaryan Shire has got together with 5 or 6 shires to develop regional waste management. [Bob Mitchell]</p> <p>Queensland's Environment Protection Policy for waste will be out soon, with a thrust for regional waste management.</p> <p>Eastern Downs Regional Organisation of Councils (EDROC) – 10 councils (Toowoomba and 9 surrounding councils) involves cooperation. [John Hasted]</p>	<p>Further examples of emerging regional cooperation.</p>
<p>3.1 Northern Rivers Regional Organisation of Councils (NRROC) (NSW border) is breaking up.</p>	<p>If this is so, it is disappointing and appears to be against the general trend.</p>
<p>3.1 The pesticide container collection used three catchment areas each made up of seven councils. [Wayne Thompson]</p>	<p>This regional structure may be an implementation option.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 Catchment areas (eg Murray-Darling catchment area) can be too big – use a small enough area to be able use your own staff, and deal with people whom you know. Some regions will require chemical experts to work with staff to collect waste. [Ray Macnamara]</p>	<p>Agreed.</p>
<p>3.1 If Queensland looked at 50 major towns, a week each place, 2 chemists, expert personnel, a laboratory with the truck, collect waste and take to a store, this would take a year to perform. Cost 5/6 people @ \$50 000 each plus a couple of trucks, accommodation etc. [Jim Straker]</p> <p>I suggest that a full-time team be employed to traverse the State to collect unwanted chemicals. This would be preceded by a full public awareness and education program to ensure the maximum number of chemical holders. Cleanaway have home-to-home collection of organic waste. [Trevor Teakle]</p> <p>I support mobile collection service whose size (number of trucks) varies based on the quantity of chemicals remaining. [Andrew Nicholls]</p>	<p>It is believed that such a centralised approach will not be the best way of meeting regional requirements, because it would reduce local input which could bring trust and expertise.</p> <p>This would keep the whole process in professional hands. It would appear likely to be very expensive, and perhaps unlikely to be agreed to by governments.</p>
<p>3.1 Is it assumed that local councils will do the collections and, if so, what about the question of liability? [Anne McLaughlin]</p>	<p>Who will undertake collections is still to be determined. ANZECC and ARMCANZ are in the process of developing a framework for a national collection scheme, and resourcing and implementation of this will need to be negotiated and agreed between stakeholders, including local government. Matters such as liability will need to be addressed during these negotiations.</p>
<p>3.1 The plan does not define who is responsible for implementing and paying. [Rob Curtis]</p>	<p>This needs to be sorted out in the negotiation process – see Section 2.7.1.</p>
<p>3.1 There is an organisational commitment from canegrowers to assist in kind, eg in publicity, communication through our newsletter that goes to 6500 people fortnightly. Sugar research station has its own magazine, and there are shed meetings, farmer meetings. [Bernie Milford]</p>	<p>Noted. This seems to be an excellent example of stakeholder involvement.</p>
<p>3.1 I believe the whole community is getting the benefit of this program and therefore I think that the community should pay through the Federal Government. [John Ready]</p>	<p>The Panel believes there is a strong argument for a major financial contribution from the Commonwealth Government, but it seems unlikely that it will put up all the money.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 Regarding council tips, Katherine is a main centre for pastoralists and could be used as a main centre for pastoral collection. Darwin to Palmerston is done by Hannon's Waste – I don't think they'd be too keen to take OCPs.</p> <p>There are four transfer stations in NT, usually staffed.</p> <p>Darwin, Palmerston, Litchfield, Coomalie, and a couple of other councils are looking at having a regional waste management site. Even waste from Katherine could perhaps come to Darwin, but for the rest of NT, there is a real problem. [Gerry Wood]</p>	<p>Noted. Cooperation between regional councils will be important.</p>
<p>3.1 It is unlikely that [certain other] stations would be staffed. [Louise Fuller]</p>	<p>The Panel suggests that staffing should be a prerequisite; some collection points may only be staffed part-time.</p>
<p>3.1 Chemical companies should fund collections to the tune of 10%. [Philip McMahon]</p> <p>Yes – however, many of the companies are not local, but based overseas. [Barry Johnson]</p>	<p>Opinion noted.</p> <p>Noted.</p>
<p>3.1 Funding is going to have to come from Federal and State governments, as they've made the laws. The money is there – it is just a matter of reallocating it, which needs reorganisation of spending priorities.</p> <p>Farmers bought chemicals in good faith – if government wants them collected, then government should pay. [Roger Kelly]</p>	<p>Opinions noted.</p>
<p>3.1 I suggest using NT anti-litter campaign as a funding model. It is funded by the beverage container industry.</p> <p>You need to have a destruction facility before doing anything – if people are to be encouraged to bring stuff to tips, then it is necessary to be able to assure them that these chemicals will be destroyed. (Compare this with paper recycling, where much of it goes to landfill because there is insufficient capacity to recycle.) [Gerry Wood]</p>	<p>Opinion noted.</p> <p>See Section 4.4 on establishing consolidation stores, which is aimed at ensuring the waste moves along the collection/destruction chain and does linger in local areas.</p>
<p>3.1 To get around the cost, I suggest offering incentives to agencies who could collect as they go about their business – this would avoid directing costs to holders themselves and spread costs across the community. [Nigel Green]</p>	<p>Individual holders will not be charged. The rest will be done under the principle of shared responsibilities.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.1 Extensive collections have already occurred in WA. There were special allocations from Cabinet to fund management of OCPs in the late 1980s – including non-specific Commonwealth money to buy back the OCPs. [Unidentified, Bunbury]</p>	Information is available about this through a consultancy study, and is summarised in the NCSDS Discussion Paper on p 24.
<p>3.1 Funding responsibility falls heavily on governments because the problem is a historical one and therefore it is difficult to assign responsibility elsewhere. This will require a whole-of-government decision with multi-agency responsibilities. [Unidentified, Bunbury]</p>	This is a widely held view.
<p>3.1 Funding should look at individual industries to see which ones will be most affected if the NCSDS did/did not take place. [Unidentified, Bunbury]</p>	Opinion noted – for consideration during negotiation under Section 2.7.1.
<p>3.2 The responsibility should be devolved in an orderly fashion throughout the State. What if a community does not have the will to be fully involved in a collection program? [Geoff Thomas]</p>	It is unlikely that the local community would not want to be involved. The level of assistance needed will vary and a major task will be to provide that assistance in a cost-effective way, while providing sufficient reassurance to foster local involvement.
<p>3.2 Do we need to visit every farmer? It would be better to examine a regional situation before targeting resources for the program. [Stephen Addenbrooke]</p>	A phased approach is likely to be followed, and quite different approaches may be used in different areas. In most areas, individual farms are unlikely to be visited.
<p>3.2 What about urban areas, businesses and government organisations such as rail authorities? [Tim Marshall]</p>	No problem with urban household collections. Business and statutory authorities holdings will be expected to be managed through normal commercial arrangements.
<p>3.2 I believe that networks are critical to the program but how will they be coordinated? [Andrew Nicholls]</p>	By the agency or locally/regionally depending upon the task being performed.
<p>3.2 Collection should be conducted on a regional basis. [Tim Marshall]</p>	This is likely to be the case, in most, if not all, circumstances.
<p>3.2 Netwaste – didn't want regional waste boards like metropolitan councils – wanted to set up instead Netwaste organisation which involves 25 councils covering one third of NSW. This was endorsed by the (NSW) Minister starting on 1 August. Resources have been made available for a two year trial program to develop the model. The Netwaste model encourages cooperation between councils and their professional staff. We believe that local government is best positioned to coordinate. [John Davis]</p>	Noted – we will follow progress with interest. NB: one of the reasons why the NSW phase 3 workshop was held in Dubbo was that, during phase 2, those involved in the Netwaste initiative had shown particular interest in developing a collections program.

Community Comments	OCP Consultation Panel Responses
3.2 The Plan should include a variety of collection modes. It needs more detail to indicate flexibility in collecting chemicals. [John Andre]	Agreed. Section 4.1 of the OCP Plan has been rewritten to allow for a variety of collection modes as long as they are consistent with the Plan.
3.3 Strategies to be used could include local newspapers, radio. [Pat Meney]	Agreed.
3.3 Networking is critical and could include school children to get the message across to chemical holders. [Pat Meney]	Agreed.
3.3 Stress the urgency of collection by making the collection period short – suggest two weeks. [Val Hooper; Stephen Crooks]	Noted.
3.3 Have mobile collection facility to reduce the cost of setting up and to have portability. [David Bolt] For example a shipping container [Stephen Crooks.] With a truck with increasing quantities of chemicals – there may be concern for Dangerous Goods. [Geoff Thomas] Have regular transport to consolidation store to reduce collection stock on truck. [Stephen Crooks]	A roving collection point is unlikely to be suitable in most areas but may work in some particular circumstances.
This program of mobile collection is maximising the risk by transporting increasing quantities of chemicals. [Peter DiMarco]	It would certainly concentrate the risk geographically, but it is far from clear that it would increase it overall.
3.3 I am concerned that short-term collections, eg a few days, have not worked in the past because even with good pre-networking, the particular collection day is not convenient to every holder. [Tim Marshall]	If the collection were to be restricted to a few days, then this would need to be preceded by intense publicity and education. Most people favoured longer periods, but not overly long – two weeks to two months was a frequently supported range.
3.3 Designated collection points are needed so holders can travel to that site. Collecting at the farm would be preferable but this would be very expensive. [Tim Marshall]	The Plan should be flexible enough to allow the community to exercise options provided safety standards are adhered to.
3.3 Drum collection program could be combined with other programs.	This could be discussed with Avcare's drum collection program.
3.3 There is a problem with the existing chemical collection program in and around Adelaide because the opening times at Dry Creek are not convenient and not regular. [Trevor Teakle]	This was directed to the attention of SA EPA.
3.3 What is the cost differential between collection via farm-to-farm visits and via a collection point? Will collection program planning include an assessment of different styles of collection and the advantages of each? [Ivan Dainis]	Intuitively it would seem to be very large. The NCSDS will need to consider relative costs and benefits of different styles of collection.

Community Comments	OCP Consultation Panel Responses
3.3 Referring to chemicals in deteriorating containers, I suggest collection in a compartmentalised drum which allows chemicals to be pumped in. [Alec Smith]	Possibly useful for those cases where deteriorating containers cannot be transported and are pumpable. Care would need to be taken not to mix incompatible materials.
3.3 Use existing infrastructure such as rural merchandiser outlets which have bunded zones. [Rod East] Rural merchandisers could provide an additional collection point but not necessarily the principal point. [David Jesse]	The majority of suppliers have indicated reluctance to do this.
3.3 Use similar farm-to-farm and household-to-household systems like the Hunter Water Board chemical collection program. [Des Collins]	There would be a cost, and asking holders to pay would probably reduce participation.
3.3 A mix of farm-to-farm visits and a collection point should be considered. [Tim Marshall]	A useful local option.
3.3 Schools have had school-to-school chemical collection. [Czes Grygorcewicz]	Information is being obtained from Education Departments – SA, ACT, Victoria and NSW have done this and ACT still does.
3.3 The chemical collections could be conducted similarly to town-to-town vaccination programs. [Ivan Dainis]	Suggestion noted.
3.3 I suggest a trial program to test a number of options. [Brigitte Schulz]	Some regions will be ahead of others, and so this could be managed if information were made widely available.
3.3 Farm-to-farm pick-ups would be very expensive. [Colin Pitcher]	Probably so, but a region might want to do it, either wholly or in part.
3.3 Farms would need to register for a pick up and may not want to do this. We have overlooked urban chemicals. Trucks would become point source problems as opposed to 100 utes driven by farmers. [Andrew Nicholls]	Any such scheme would need detailed planning and consultation given the range of issues which need to be dealt with.
3.3 How will remote locations be handled in this program? [David Jesse]	Holders may have to travel long distances to collection points. Some forms of additional assistance may be necessary in such circumstances, including means of bringing services closer to holders.
3.3 What is intended – a permanent or temporary collection point? This is not clear. A lot more hazardous waste would be collected if a permanent site were established. [Barbara Murrum]	A non-permanent collection point would be adequate for OCPs, but a permanent arrangement could be considered for ongoing collection of other chemicals.
3.3 You need to use different network systems for getting information to chemical holders, in collection programs, and in post collection activities. [Tim Marshall]	Agreed.
3.3 Efficiency of chemical collections is an important issue in developing the program. [Ivan Dainis]	Local factors will impinge on this.

Community Comments	OCP Consultation Panel Responses
3.3 Use a phone-in service to get more accurate figures. [Rod Lewis]	For consideration during the implementation phase.
3.3 Flexibility is critical to any collection program. [Trevor Teakle]	Agreed. Local and regional differences need to be accommodated.
3.3 I suggest that some councils might have joint collection points, others might have their own, as suits them best, others might have waste shipped to a central point eg Dubbo. Some might be done commercially, some by local government as suits. [John Davis]	All of these methods may be appropriate in particular regions.
3.3 More collection time should be allowed in areas where distances are large and holders don't come to town very often. [Ivan Diggs]	Such factors need to be borne in mind when devising local implementation plans.
3.3 I suggest different sectors take responsibility for different parts of the process (agricultural industry for collections, transport industry for transport from collection points, State governments for destruction, Federal Government from there). [John Davis]	For consideration during implementation.
3.3 Previous collections are mentioned on the fact sheet and we can draw on the experience/expertise there. [Unidentified, Dubbo workshop]	Agreed.
3.3 You have to get information to schools, radio stations, newspapers – need to have them eating, breathing and sleeping the stuff. [Marion Webster]	Agreed – at least for the first half of the sentence!
3.3 A letter specifically addressed to householders is more likely to be read than leaflets distributed with rates notices. [David Hughes]	Agreed, but there are about six million households in Australia, so this would be an expensive option unless used selectively.
3.3 Focus on land/farm journals – you will get a lot more mileage out of a press release than a newspaper advertisement – every media outlet has a slow day. [David Hughes]	Agreed.
3.3 ACT did its first collection in 1989 and OCPs were banned in 1993. Since then, smaller quantities of unwanted chemicals (about 1.5 tonnes per year) have been coming in (these have been a variety – not just OCPs). There are 2 types of customers in ACT: (1) mobile population – people moving house cleaning out their old chemicals; and (2) aged people. [Peter McDowall]	Noted.
3.3 ACT used to have collection days, but moved away from that because people sometimes missed the date or got it wrong – so a mechanism is needed to prevent dumping. [Tony Hodgson]	Greater flexibility or a range of options may be required.

Community Comments	OCP Consultation Panel Responses
<p>3.3 I suggest a mobile collection system, though I doubt whether any council office in south-eastern NSW would have the expertise to run this – need somebody with expertise and facilities to deal with the range of things that will be brought in, as people won't just bring in OCPs. [Mike Thompson]</p> <p>Collect from farms. [Peter Wong]</p>	<p>This is an option, although a system based entirely on mobile collection facilities is likely to be more expensive than one based mainly on holders bringing wastes to collection points.</p>
<p>3.3 Smaller farmers will not go further than the farm gate to get rid of OCPs, so get them to leave at the farm gate for collection from there. [Trenchard Smith]</p>	<p>Experience shows that many people will take their waste to a collection point. There would be dangers associated with leaving chemicals unattended at the farm gate, and significant liability questions.</p>
<p>3.3 LAWMAC is a committee providing advice to 17 local authorities on waste issues; they meet quarterly. There are commercial collectors and LAWMAC would use them. [Ian Kuhl]</p>	<p>Another example of regional cooperation which may have a role in a collections program.</p>
<p>3.3 What if the commercial operator with whom you have a contract goes out of business? You will have wasted the money so far invested. [Kylie McLachlan]</p>	<p>These are commercial risks, which should be guarded against in any tendering process for collection services.</p>
<p>3.3 I think there will be one collection point per shire around Mackay, with perhaps two in the biggest shire in the region. [Sue Rowlinson]</p>	<p>Opinion noted.</p>
<p>3.3 Don't forget the islands out there such as Hinchinbrook, where these materials have been used. [Mark Hoogsteijns]</p>	<p>This is an important point – offshore islands in general should not be overlooked.</p>
<p>3.3 With drum collection, there is a proposal for a number of companies to travel around the country with crushing equipment for a short time and have people bring in their drums. Could this be used as a model for OCP collections? [Jamie Cupples]</p>	<p>Mobile collection points could be an option in some areas.</p>
<p>3.3 Have you done any research into collecting? If 6 months is allowed, will there be a run at the end, or does it give people more time to do it? Bernie Milford]</p>	<p>A consultant has investigated past collection and a summary of that work is in the NCSDS Discussion Paper.</p>
<p>3.3 The rate at which you collect should be the rate at which waste can be treated. If there is a long-term collection, the local community will have to take responsibility for this. [David Miles]</p>	<p>A clear message has come through from local government that it is unwilling to take long-term responsibility for storage. There is also a clear message that these wastes need to be removed to collection points and then to consolidation stores within a reasonably short time frame.</p>
<p>3.3 The collection points need to be well patronised to warrant having personnel on site at all times. [Scott Blacklow]</p>	<p>If patronage is relatively low, the collection point may only be available for a limited time each week/fortnight.</p>
<p>3.3 If the right infrastructure were established or utilised then better economies of scale would make it possible to provide suitably trained personnel. [Wesley Hazell]</p>	<p>Noted, although in reaching such a scale, collection points may become more remote from many holders.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.3 I have organised a collection north of Ararat. I can see the same problems found with the gun buy-back, ie continuing collections will be needed to get most of the material. [Bruce Burrow]</p>	<p>Opinion noted.</p>
<p>3.3 Local government is a mixed bag in NT, with about 6 municipal councils and a number of (very small) Aboriginal Land Councils and no planning controls. [Gerry Woods]</p>	<p>The Panel notes the difference between NT and other jurisdictions, which underlines the need to define workable local solutions.</p>
<p>3.3 In NT, about half of all homes and farms would have OCPs. [Charlie Halloran]</p> <p>The larger quantities would be in rural areas. [Gerry Wood]</p> <p>In the (NT) University, I think that enquiries from people interested in knowing where they can dispose of their OCPs have come mainly from rural holders. [Alison Scott]</p>	<p>Noted.</p>
<p>3.3 One thing that needs to be considered here is that there are two sorts of rural groups – rural/urban (ie in Darwin hinterland) and rural/pastoral (outback). Distant people would fly to collection points. [Ian Philip]</p>	<p>Noted. The communication strategy may need to address the risk of holders not properly securing packages of OCP waste for air transport, where necessary.</p>
<p>3.3 A full public awareness program would get the message out to chemical holders. However, this would have regional variability and this should be factored in. [Ross Britton]</p>	<p>Agreed – for the implementation phase.</p>
<p>3.3 Many of the programs such as container collection are not advertised widely and results are poor. You need to use the full industry network. [Trevor Ranford]</p>	<p>The importance of networking is agreed.</p>
<p>3.3 I suggest a letterbox drop as the most effective means of getting the message to chemical holders. There is a need to catch the eye and draw in the target audience. [Michelle Brenton]</p> <p>Letterbox drops have been used in a region of 30,000 households with 100 responses. [Geoff Sclare]</p>	<p>Previous experience leads us to question the effectiveness of this technique – the response is often very low. Effective networking and supportive media are likely keys to success.</p>
<p>3.3 We need to convince some chemical holders to part with their chemicals. [Rod East]</p>	<p>Yes, we expect some people will be reluctant to give up their holdings..</p>
<p>3.3 Different approaches will be needed in different jurisdictions and regions and shires. [Ross Britton]</p>	<p>Agreed.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.3 Why couldn't councils be subsidised by government to set collection points up? Local governments need incentives, assistance to set these up – it is too much for local government to do alone. [Pam Moore]</p> <p>The sticking point seems to be that there need to be temporary storage sites, but they don't exist at this stage except commercial ones. [John Howarth]</p> <p>Retail stores as collection points would be made prohibitive by insurance companies. [Bob Barwell]</p>	<p>Such considerations will determine the participants and the arrangements between them.</p>
<p>3.3 Some solutions are OK for little shires – mine is huge – logistics would be unworkable. [Richard Hernando]</p>	<p>In some of the more remote areas, it may be necessary to take the collection points out to the people. It would be too expensive to do this everywhere, but this could be considered for more sparsely populated shires.</p>
<p>3.3 The problem is that we don't know the volumes – we need some concept of what material needs to be collected or we will be talking in circles. [Colin Sims]</p>	<p>At most collection points the volumes would be quite small. NSW EPA has indicated that minimum requirements for such storage would be secure fence, impermeable floor, roofed, walled and inspected, which should not be difficult for most councils to meet.</p>
<p>3.3 The quantity involved would affect the nature of the regulation. [Philippa Rowland]</p>	<p>Agreed.</p>
<p>3.3 A shipping container with a fence around it would not be acceptable to the WorkCover Authority – issues of ventilation, lighting, licensing – this requires a reality check. [Cormack Dunn]</p>	<p>The response from NSW Agriculture was that there is a difference between what constitutes a chemical store for chemicals to be used and a store for waste chemicals.</p>
<p>3.3 Suggestions from the Dubbo workshop for means of spreading information included:</p> <p>State Agriculture Depts [Greg Markwick] Producer groups [Philippa Rowland] Farmcare farm chemicals users course [Bob Barwell] TAFE [Marion Webster] CWA and Rural Women's Networks [David Hughes] Posters [John Beard]</p>	<p>Noted. All of these groups and mechanisms will have roles to play.</p>
<p>3.3 The problem with Farmcare is that it is a rigid program – difficult to get material into formal courses. [Roger Toffolon]</p>	<p>It was not our primary intention to suggest this, but rather to make use of the database which represents those who had attended courses.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.3 Should we be asking people to handle and deliver substances? – this could be very dangerous [cited example of someone who had had some hazardous material in their back shed for many years and could have suffered very serious adverse effects if they had touched the material when they came to have it moved]. [Roger Van Cornewal]</p>	<p>A helpline or similar mechanism which enabled people to judge whether material was safe to handle without professional help could be useful. A door-to-door approach is not intended as a standard approach but occasionally may be justified.</p>
<p>3.3 If holders have to keep a whole lot of different containers segregated, they will need a range of different size Hazmat overdrums – how do they get hold of them and who will pay for them? [John Kent]</p>	<p>Such details will need to be worked out prior to implementation – it is unlikely that individual holders will be expected to pay.</p>
<p>3.3 Will it be a legal requirement for holders to submit product for collection or will it be a voluntary scheme? [John Kent]</p>	<p>The OCP Plan requires that scheduled OCP waste be collected, handled, transported and destroyed in particular ways and within particular timeframes, and governments are expected to have or put in place appropriate regulatory mechanisms to ensure that the provisions of the Plan are met. We therefore envisage that it will be mandatory for holders to submit product for collection, but it is unlikely that there will be sanctions or prosecution for being in possession of the waste, at least prior to and during any collection.</p>
<p>3.3 I suggest contracting private companies to collect. [Mike Thompson]</p>	<p>Commercial elements will likely need to be balanced with in-kind contributions to come up with an affordable collection scheme.</p>
<p>3.3 I suggest taking a mobile unit to designated points similarly to a mobile library, rather than travelling all around the shire. [Gratton Wilson]</p>	<p>This could be considered for some areas.</p>
<p>3.3 Probably 20 collection points in the whole south-east region of NSW would be adequate. [Mike Thompson]</p>	<p>Opinion noted.</p>
<p>3.3 If mobile facilities were to be used, it would be important that the operators be equipped and trained to remove damaged drums. [Robyn Holden]</p>	<p>Agreed – appropriate training of all collection point operators will be essential.</p>
<p>3.3 Councils should equip regional landfills with facilities for temporary holding, washdown and emergency response – permanent facilities will be of more value to the community over time. [Peter Wong]</p>	<p>Agreed.</p>
<p>3.3 How do you recognise these chemicals, especially if they are identified only by trade name? [Craig Darlington]</p>	<p>A fact sheet has been produced and is available from the Waste Management Secretariat.</p>
<p>3.3 I believe it will be necessary to go out to farms to collect. [Ray Macnamara]</p>	<p>Some areas may use this system, but others will probably want waste holders to bring waste to collection points.</p>
<p>3.3 There is a need to get going and learn as we go, or else we'll never get started. [Ray Macnamara]</p>	<p>Agreed.</p>

Community Comments	OCP Consultation Panel Responses
3.3 With OCPs in cotton growing areas, when delivering cotton to cotton gin, deliver unwanted chemicals at the same time. [John Hasted]	For investigation in the implementation phase.
3.3 Consider urban areas too. [Paul Smith]	Urban areas are part of the problem; they will not be ignored.
3.3 Some of the resellers have had recall programs. Use the same process to collect OCPs. [Trevor Lloyd]	Product recalls are for registered products and are usually done because a problem has been discovered in a single batch of manufacture. This is not the same as a waste collection program, which raises a wider range of problems.
<p>3.3 In sugar areas, resellers are looking at a strong role in the container recycling program. [Bernard Milford]</p> <p>I spoke to resellers in Mackay about the OCP collection – they were not interested, but the local government (hinterland – 7 councils) would see themselves doing this. [Sue Rowlinson]</p> <p>I agree about resellers; resellers will not want to be involved in the collection program. [Jamie Cupples]</p> <p>Chemical retailers would not be keen to collect unwanted chemicals because of the poor state of some containers. [Richard Emmerson]</p>	The majority of resellers have indicated a reluctance to become involved in the collections.
3.3 Depending on how the collection is run, and who holds the liability, resellers may accept OCP waste on a short-term basis. It should be possible to hire part of a store area – eg transporter/storage service. A fair degree of flexibility is needed; solutions will vary from area to area. [John Ready]	Noted.
3.3 Cooperatives are potential collection points, but only if the materials are in and out very quickly. [Paul Sgarbossa]	If the turn-over at the collection points were too rapid, it may cause management problems.
3.3 I think that growers will prefer to hand in their materials directly to a government agent as the authority to deal with it, rather than give it to the person they are buying new product from. [Jamie Cupples]	Noted.
3.3 Everyone who works in the system is under the general duty of care. In addition, anyone can be liable under the law of tort. [Trenchard Smith]	Agreed

Community Comments	OCP Consultation Panel Responses
<p>3.3 It would be possible to conduct collections on a council by council basis if appropriate support were given. [Jon Doole]</p> <p>Ownership of the problem would be better managed on council basis. [Peter Valentine]</p> <p>Tasmania should be treated as a whole region. [Wesley Hazell]</p> <p>The program could be coordinated by the Sustainable Development Advisory Council. [Stephen Waight]</p> <p>I am worried about a Council-by-Council approach because of diseconomies of scale. [David Baker]</p> <p>The details of implementation will be affected by the new environmental policies which are being developed. [Lara Giddings]</p> <p>It would be confusing to have different approaches in an area as small as Tasmania. [David Baker]</p>	<p>Options noted, but final mechanisms will rest with the local and regional implementation program.</p>
<p>3.3 Collection points could be appended to existing transfer stations. However, transfer stations cover 4-5 local council areas. [Adrian Lewis]</p> <p>Chemical wastes are perceived as material like domestic waste, so landfill or transfer station sites are appropriate for collection points. [Peter Valentine]</p>	<p>Agreed that existing facilities should be used where possible, and some materials handling expertise is likely to be available at transfer stations.</p>
<p>3.3 I am concerned over the liability issue in relation to collection points, transfer stations etc, particularly if these are not attended by personnel. I have an additional concern for training of personnel if present. [Jon Doole]</p>	<p>A minimum requirement will be for collection points to be staffed when open. Agreed that appropriate training is essential.</p>
<p>3.3 Shipping containers could be used for collection points. [Scott Blacklow]</p>	<p>This is an option.</p>
<p>3.3 Given that waste will ultimately be transported to Victoria from Tasmania, the holding periods at collection points could be very short, such as a fortnight. [Jon Doole]</p>	<p>This will depend on the volumes held at collection points.</p>
<p>3.3 Interest in collections should be generated from within particular industry and community groups instead of a general across-the-board program. [Wesley Hazell]</p>	<p>Agreed – this promotes ownership. Targeting will be essential for an effective and affordable program.</p>
<p>3.3 Local politicians would be keen to promote this program. [Lara Giddings]</p>	<p>Noted.</p>

Community Comments	OCP Consultation Panel Responses
<p>3.3 Use existing programs such as Agfest to promote collection programs but also possibly have a collection point established at Agfest. [Adrian Lewis]</p> <p>I suggest that field days be used because farmers would not be inconvenienced if they intended to go to the field day. [Chris Stebbing]</p>	<p>Agfest may be good for promotion but, in general, agricultural shows are likely to be unsuitable for collection points unless great care is taken to separate them from other activities.</p> <p>Field days could be used for distribution of information but not for the actual collection.</p>
<p>3.3 Use high profile people (eg Rosemary Stanton) to publicise and get the message across. [Peter Valentine]</p>	<p>To be considered in the implementation program.</p>
<p>3.3 At what level will collections be conducted – from house to house or regional transfer stations? [Jean Wilby]</p> <p>Given that older generations may hold stocks of OCPs, would house-to-house collection be appropriate? [David Judson]</p> <p>Broken containers could require house-to-house collection by trained personnel. [Jon Doole]</p>	<p>The balance of the program will be strongly towards holders bringing in their wastes but some collecting from individual farms/residences may occur. Educational material about handling damaged packages will be needed.</p>
<p>3.3 In most cases the community will have the perception that all of this is a local government responsibility. [Jon Doole]</p>	<p>This is likely.</p>
<p>3.3 Hotline numbers could be useful to allow chemical holders to seek advice. [Jean Wilby]</p>	<p>Agreed.</p>
<p>3.3 Use Clean Up Australia to promote chemical collection program. [Adrian Lewis]</p>	<p>To be considered in the implementation phase.</p>
<p>3.3 The new secure landfill site near Devonport could provide a useful collection point for OCPs and a consolidation store for the rest of Tasmania prior to transport to Victoria for destruction. [Pat Deprez]</p>	<p>To be considered in the implementation phase.</p>
<p>3.3 Liability throughout the collection process is an important issue which should be addressed. [David Baker]</p>	<p>Agreed.</p>
<p>3.3 A specific secure collection point may not necessarily overcome the concern about landfill scavenging and vandalism. This could be overcome by having full time personnel attending the site. [David Baker]</p>	<p>Agreed – sites need to be secure and staffed when open.</p>
<p>3.3 Storage in accordance with Dangerous Goods provisions should ensure that the security of the site is covered. [Jock Barclay]</p>	<p>This should provide a reasonable measure of protection.</p>
<p>3.3 For holders who may be fearful that declaration of holdings will lead to negative impacts upon them, you may need to provide anonymity through an outreach program. [Bruce Burrows]</p>	<p>This option may be considered.</p>

Community Comments	OCP Consultation Panel Responses
3.3 A proactive program is needed to deal with deceased estates to avoid dumping before property is sold. [Bruce Burrows]	Agreed, but this is a difficult issue.
3.3 Because of council amalgamations, the issue of scheduled waste may fall through the cracks and it will take some effort to get it onto the agenda. [Bob Handby] Identify a person in council whose responsibility it will be. It may be necessary to lobby senior levels to get this to happen. [Les Toohey]	This will have to be taken into account during implementation.
3.3 Use a national facilitator with personal contact at the local level. [Bruce Burrows]	Noted, although facilitation at State/Territory level may be more likely.
3.3 Stock agents are still a good vehicle to get the message to potential chemical waste holders like farmers. [Allan Bonollo and Tony Britt] Chemical retailers are also a good vehicle to get the message across. [Felicity Pritchard]	Agreed.
3.3 The Victorian ‘Paddock to Plate’ program could be a useful vehicle for the chemical collection program and Hazard Assessment Critical Control Point (HACCP) for the Fresh Food Approach to clean food principles. Schools are similarly a good vehicle to reach chemical holders. [Allan Bonollo]	Yes – these should be investigated for linkage opportunities. (The ‘Paddock to Plate’ program includes ‘Care’ programs such as Cattle Care, that require users to declare chemicals stored and used via a chemical history record. The Hazard and Critical Control Points system is a quality assurance (QA) program used by the food manufacturing industry to maintain highest levels of food safety and hygiene practices. The Fresh Food Approach is being adopted by some retail chains and involves strict QA standards for chemical residues and food hygiene.)
3.3 Mornington Shire Council has banded containers suitable for accepting unwanted chemicals. Council pays a qualified operator to manage the collection point. [Uldis Neilands]	This may be a valuable asset in the implementation phase.
3.3 The collection points need to be conveniently placed to maximise and encourage collection. [Uldis Neilands]	Agreed.
3.3 Convenient locations are usually public places and therefore having collection points at these could be seen as public health risks. [John Hogan]	Such issues will need to be resolved at the local level.

Community Comments	OCP Consultation Panel Responses
<p>3.3 The open timeframe collection was very inefficient whereas specific dates which were well publicised allowed for effective collection. [Les Toohey]</p> <p>I agree with Les Toohey that each shire in Western Victoria has sufficient chemical waste to warrant a collection point. Travelling 50 km would be reasonable provided the farmer was actually intending to travel to a regional centre for another purpose like shopping. [Bob Handby]</p>	Noted.
<p>3.3 Chemicals surrendered in damaged containers may pose serious concerns for residents near the collection point. [Campbell Hair]</p>	This is an important issue in the siting of collection points. It also corroborates the reluctance of most resellers to provide collection points.
<p>3.3 Dalgety already is licensed to store chlordane in NT – retailers could be used to help with collections. [Roger Kelly]</p>	Most retailers the Panel has spoken to would not wish to participate.
<p>3.3 The rural mentality about travelling is focussed on regional centres. If you set up collection points on the edge of towns you are more likely to get chemicals from both the farm and town population. [Bob Handby]</p>	Agreed.
<p>3.3 Existing infrastructures such as school bus routes provide an understanding of the community travelling habits. This could indicate where collection points could be located. [Bob Handby]</p>	A good suggestion which needs to be explored further.
<p>3.3 Local councils had good intentions in conducting collections but they didn't always have the infrastructure and expertise to do this. Liability issues were a factor with potential for accidents. [John Hogan]</p>	It is important to consider all aspects so that infrastructures back intentions.
<p>3.3 The landfill levy is funding recycling and waste management issues in Victoria. [Gary Newman]</p>	This may be a potential source of some funding but additional sources will be required.
<p>3.3 The greatest contact stock and station agents would have would be with large pastoral holdings. [Barry Johnson]</p>	Noted.
<p>3.3 Catchment Management Boards are a good conduit for managing the collection processes. The local community are heavily involved in these Boards. [Richard Steere]</p>	To be considered in the implementation phase.
<p>3.3 Pick up instead of deliver, but you would probably still need a collection point. At the moment, there is no collection point in NT. Dieldrin being stored would be a security problem. [Gerry Wood]</p>	Security will be important at collection points.

Community Comments	OCP Consultation Panel Responses
<p>3.3 OCP collections are exactly the same as gun control – a scheme is going to have to be put there and monitored. How did people get these chemicals in the first place without permits? [Charlie Halloran]</p>	<p>No permits were required.</p>
<p>3.3 Would a further survey be worthwhile? [Ian Philip]</p>	<p>Further survey work is of doubtful value except in specific and strategic circumstances.</p>
<p>3.3 If you're going to ask for government funds, then you have to know exactly what is required, as you will have great trouble convincing governments of the need for new facilities etc, unless it can be shown what to hang it on. [John Alcock]</p>	<p>We have to try to convince governments based upon the information we have and pointing to the potential deleterious effects of doing nothing – eg another export beef contamination problem.</p>
<p>3.3 Use stock inspectors to conduct a survey of pastoralists. [Ian Philip]</p> <p>DPI has already briefed all the Landcare groups on waste control – can repeat this – prepared to get the stock inspectors in to have a look at this. [John Alcock]</p>	<p>Noted.</p>
<p>3.3 Won't a NT-wide baseline study be required, and is that possible? [Philip McMahon]</p> <p>I don't think you could do a survey or pilot or anything else along these lines until you have educated people. [Sue Nixon]</p>	<p>It is unlikely that further major surveys will be undertaken prior to collection.</p>
<p>3.3 People who go collecting should themselves be part of the education program – build on that to get a better picture. NT is going to have to have these stores; it is not going to get away with sending OCP waste interstate – the question is whether they should be fixed or mobile. [Nigel Green]</p>	<p>Agreed that we should be pragmatic about this and use existing networks and infrastructure as far as possible to do this. While collection points will need to be established in the NT, it is most likely that the OCPs will be sent interstate for destruction as there are currently no destruction facilities in the NT.</p>
<p>3.3 Don't try to educate everybody at first – I think you have to start off with some kind of package. For a pilot scheme, I think the first thing you need is to work out who the main target groups are. [Sue Nixon]</p>	<p>Trialing the education materials and identifying target audiences are very important.</p>
<p>3.3 People will be worried about getting into trouble for holding this stuff – there is a need to ensure confidentiality. [Alison Scott]</p>	<p>Agreed – all disincentives should be eliminated/avoided.</p>
<p>3.3 Collection points have to be built, and they need to be for all chemicals, not just OCPs, as we want to stop the others from going to landfills too.</p> <p>There are reasonably cheap ways of getting the message out there – it doesn't have to be a 'grand plan'.</p> <p>NT Government's job is going to have to be to enable the transfer of materials from collection points to consolidation stores. [Gerry Wood]</p>	<p>Purpose built chemical collection points may be part of a future ongoing chemical collection program, but are not likely to be the norm in this instance.</p> <p>Yes, this is likely to be the responsibility of State/Territory governments.</p>

Community Comments	OCP Consultation Panel Responses
3.4 WA has a good legislative framework to enable different levels of government to be brought together. [Peter Waterman]	Opinion noted.
3.4 I would prefer a program on a shire by shire basis with integration into regional then state areas. [Unidentified, Bunbury workshop]	Such a model may apply in many areas.

Section 4: OCP sampling and analysis

Community Comments	OCP Consultation Panel Responses
4 Will sampling be undertaken at collection points? [Peter DiMarco]	It is more likely at consolidation stores to ensure internal efficiencies. Preliminary identification at collection points will minimise need for analysis at consolidation stores, but collection points will not be the place for a major analytical effort.
4 Is there a quick dip stick test to help identify OCPs at a collection point? [Alex Sas]	Not at this stage.
4 Use the Beilstein test to identify halogen-containing substances. [Czes Grygorcewicz]	This is not a definitive test for scheduled OCP waste, only for chloro-, bromo- and iodo-compounds.
4 I do not believe that the disposal industry will take any unidentifiable material. [Peter Wong]	Operators of destruction facilities will undertake their own check analyses. In the unlikely event that the material is unable to be identified, they will need to assure themselves that it does not contain any components which may harm their equipment/process.
4 The extent of thoroughness of analysis depends on the robustness of the destruction facility.	Agreed.
4 An album of labels would be helpful. [Mark Gorta] Old labels are hard to find, so a document should be prepared which contains examples of old labels. [Chris Moon] WA Agriculture Department can provide copies of chemical labels – other states should be checked. [Peter Rutherford]	Good ideas – such an album/document, perhaps held at collection points, could be very useful.
4 An important aspect is identification – the heading should be “ <u>Identification</u> , sampling and analysis”. [Peter Waterman]	Agreed – this section (now 7) heading has been amended.
4 I have bought spray at a local auction, I can no longer use the material, farmers have to pay for what is wrong, we should not have to, we should be paid for the material. [Peter Dekeersgieter]	It is highly unlikely that there will be a buy-back program.

Community Comments	OCP Consultation Panel Responses
<p>4; 7 Plan should include a clause in sections 4 and 7 to the effect that if non-OCPs are collected during an OCP collection, they will be handled in a particular way (or cross reference with another guideline). [Adrian Lewis]</p>	<p>This will need to be considered at a local/regional level but the detail probably should not be incorporated into the Plan. This is a matter for the NCSDS.</p>
<p>4.1 Amend to read “where OCP waste is in its original sealed container”. [Isabelle Vallin]</p> <p>Sealing technology has not always been around – this would be imposing an undue requirement. [Ian Coleman]</p> <p>I accept this point, as the bulk of the material collected from farms would come in open containers. [Mike Darby]</p>	<p>It will be hard to tell whether containers have been opened. We would expect decisions to be based upon judgements made at collection points and consolidation stores.</p>
<p>4.2 Sheep dip surveys were undertaken in the past – we need to know what products were used. [Peter Waterman]</p>	<p>Agreed. The collections of labels held by NSW EPA and also other jurisdictions and the National Registration Authority for Agricultural and Veterinary Chemicals should help in this.</p>
<p>4.2 NSW Agriculture facts sheets also tell you what is used. [Phil Hansen]</p>	<p>Noted.</p>
<p>4.2 Imaging technology is available to read labels. [Ian Coleman]</p>	<p>Noted.</p>
<p>4.2 The pre-collection storage information sheet should provide guidance on maintaining labels and assist with understanding of identification. [Les Toohey]</p>	<p>A guidance note will need to be prepared on identification and storage of waste by holders prior to collection to assist the collection/destruction process.</p>
<p>4.2 Did the mixtures mentioned by John Hogan (OCPs with arsenicals) arise from farmers making their own formulations? What awareness programs should be instigated to prevent or minimise this? [Bob Handby]</p>	<p>A few of the mixtures which are now difficult to treat were sold as such, but many of them were created in the collection process in the late 1980s when it was assumed that the chemicals would be treated by high temperature incineration and less attention was paid to keeping materials segregated. The destruction technologies now in use are less omnivorous than incineration and can have great difficulty dealing with some mixtures, so greater care will need to be taken not to mix incompatible materials.</p>
<p>4.2 This says that testing is not required at collection points, but 4.3 says that managers of collection points shall undertake indicative analysis – isn’t that therefore a furphy? [Sue Nixon]</p>	<p>Section 4.2 (7.2 of the completed OCP Plan) applies <i>prior</i> to receipt at collection points. Section 4.3 (7.3 of the completed OCP Plan) has been rewritten to improve clarity.</p>
<p>4.2 Some of the chemicals are very old and a lot of them are in metal containers, so you’d be lucky to get them to collection points, as they would be rusting away. Who at a collection point/municipal tip is going to be qualified to handle this stuff? [Gerry Wood]</p>	<p>Trained personnel will be needed.</p>
<p>4.3 Are you separating OCPs from other chemicals? [John Ready]</p>	<p>For the purposes of this plan, yes; but OCP collections may be part of broader chemicals collections.</p>

Community Comments	OCP Consultation Panel Responses
4.3 How will products that contain the “villains” be identified? [John Howarth]	There is a fact sheet on trade names (Scheduled Wastes Fact Sheet No 5, available from the Waste Management Secretariat). Many government agencies have collections of old labels for pesticides and the option of producing albums of these for collection points and consolidation stores is being considered.
4.3 The Merck Index might be helpful too. [John Beard]	Agreed.
4.3 In a situation where chemicals coming in may be incorrectly labelled or even unlabelled, what is there to protect a collection point from chemicals not known about – is there any means of quick testing, or are you going to assume the label to be correct? [Paul Handsaker]	There is no quick test – the precautionary principle should prevail and unidentified chemicals should be assumed to pose maximum hazard.
4.3 What are the logistics and funding requirements for identification and analysis at collection points and consolidation stores? How will identification occur? [David Baker]	This will vary from region to region but trained personnel will be an integral part of the process.
4.3 Segregation at collection points may not be able to be conducted professionally by existing council officers. They would need adequate training to do this. [Ian Manley]	Agreed, training of collection point personnel would be a high priority (Section 12.3).
4.4 Page 8 – NATA means National Association of Testing <u>Authorities</u> not <u>Laboratories</u> . [Tony Britt]	Plan has been amended accordingly (see Section 7.4).
4.5 Collection point staff may not have the expertise to handle, mix or bulk chemicals, so this should be done at a consolidation store. [Geoff Harcombe] Mixing should be done by highly trained personnel. [Chris Phillips]	Agreed. It is anticipated that most mixing and bulking will be carried out at consolidation stores.

Section 5: Notifiable quantity

Community Comments	OCP Consultation Panel Responses
5 Notification should begin at the local collection point [Heather Jones; David Keamy]	This agrees with the provisions of the OCP Plan as outlined in Section 6.2.
5 A minimum quantity should be set before a collection point is established. [Peter Rutherford]	This is a ‘chicken and egg’ situation. The Panel believes that the establishment of the collection points will encourage the bringing forward of the material and responsible authorities will consult and exercise judgement in establishing the number and geographical locations of collection points.
5 Real estate agents won’t notify of stocks in the shed as they’re only in it to make a dollar. Also, there is a high turnover of real estate agents. [Charlie Halloran]	Special consideration needs to be given to this in the implementation phase.

Community Comments	OCP Consultation Panel Responses
5 What is the point of notifiable quantity? [Robyn Dyall]	The Panel believes that people will want to know what sort of quantities are being held in stores near them.
5.1 Will there be a record of who brought chemicals in? [Joanna Datson]	No.
5.1 Empower the community with sufficient knowledge to make appropriate decisions and remove the guilt of still holding banned chemicals. [Unidentified, Bunbury workshop]	Agreed – mechanisms for achieving this will be an important part of implementation.
5.1 Need to log who has handed in chemicals, need to return once more during a regional program where a truck goes from shire to shire. [Peter Wahlsten]	The OCP Plan does not require individual holders to notify; however, if they want a record of the wastes they hand in this could be accommodated, but it must be voluntary. Opinion of need for a repeat visit noted.
5.1 Is it possible that there will be a register of names of people delivering pesticides – if so, some people might be fearful of being raided in future. Will there be wide advertising of the plan? [Geoff Sullivan]	The Panel doesn't envisage a register of those who hand in pesticides – we want to encourage people to come forward. Wide advertising will be essential.
5.1 If you have a government agency collect, people will not hand the OCPs in to government. They can be collected if people handing them in stay anonymous. [John Ready]	There is no requirement for them to identify themselves.
5.1 Why not add a couple more words to let holders know that they can remain anonymous. [Bob Barwell]	This section (now 6.1) could have been improved by rewording. We intended to do so but unfortunately missed it in the redrafting.
5.1 What level of policing would farmers accept to establish how much OCP still exists? [Greg Stewart] The TB eradication program was made compulsory. Could collections be made compulsory at specific times, given specific instructions, etc? [Trenchard Smith] Compulsion does not always work – there is a small minority where this would be necessary. [Kylie McLachlan]	Individual holders are not required to notify under the plan, because it is believed that any suggestion of policing would be counterproductive.
5.1 Is it illegal to hold these pesticides? [John Beard]	NSW EPA advises that while it is illegal to possess unregistered chemicals in NSW, it has discretion in applying this and is much more interested in pursuing illegal <u>users</u> , rather than holders, of these chemicals.
5.1 Forget the big stick, farmers want to get rid of these chemicals. [Jamie Cupples]	Agreed.
5.1 If we do not go down the voluntary path, then external markets may force us to use compulsion. [Peter Brock]	There is some risk that this will occur.

Community Comments	OCP Consultation Panel Responses
<p>5.2 10 kg in brackets – what does this mean? [Trevor Ranford]</p> <p>5.2 It is important to specify whether it is 10 kg of product or active ingredient. [Peter Rutherford]</p>	<p>It means 10 kg of active ingredient, as defined in Section 1.11. Section 6.2 now makes this clearer.</p>
<p>5.2 Collection points and consolidation stores are required to notify holdings >10 kg, but there does not seem to be any mechanism to require ongoing reporting of holdings thereafter. I suggest having a requirement for reporting of holdings at a reasonable frequency (yearly would be too long an interval – perhaps quarterly). [Michael Nicholls]</p>	<p>The question of frequency of reporting of notified holdings will need to be sorted out during implementation. It is not felt that this level of detail is necessary in the plan, although we accept that it does need to be dealt with.</p>
<p>5.2 What if we had 20 collection points with 9 kg each? [Wayne Thompson]</p>	<p>This hypothetical is acknowledged, but to regulate below 10 kg would be a potential misallocation of resources and a line has to be drawn somewhere.</p>
<p>5.2 In a situation where a facility is open for some time, and receives 50 kg of scheduled OCP waste, gets rid of it, then a little later receives another 50 kg, would there be a need to respond/record each time. [Paul Smith]</p>	<p>Yes. See Section 6.2. If it is important to notify the first instance, it would be equally important to notify a later instance.</p>
<p>5.2 I am concerned that there are no time limits specified for notification of quantities held at collection points. If conditions are too onerous, this may lead to lots of paperwork and the whole thing will become unworkable. [Rod Schultz]</p>	<p>This level of detail will have to be determined during the implementation program.</p>
<p>5.2 It would be more practical to deal with litres instead of kilograms. [Gerry Wood]</p> <p>If litres were used, this might encourage people to decant. [Nigel Green]</p>	<p>No, because we are dealing with the actual weight of active ingredient, not the volume of the formulation.</p> <p>Agreed.</p>

Section 6: OCP-contaminated soil

Community Comments	OCP Consultation Panel Responses
<p>6 What happens about mining sites? – I think most mining sites have arsenic. Also used in timber plants. [Marion Webster]</p>	<p>This is mostly contaminated land, so not covered under this plan. Arsenic is not covered by the OCP Plan.</p>
<p>6 Public health concerns for under-house areas treated with OCPs give good reason to include contaminated soil in the scope. [Bruce Burrow]</p>	<p>These areas are excluded from the provisions of the OCP Plan under Section 2.4. This is not to say that this issue is not important but rather that it is being addressed through another mechanism.</p>

Section 7: OCP waste storage, handling and transport

Community Comments	OCP Consultation Panel Responses
<p>7 I am not confident that farmers will bring in chemicals and am concerned about what collection points will do with stored chemicals – theory seems fine but I am worried about what will happen in practice. How do we maximise the collection process – will people take part?</p> <p>There is a lack of confidence in the existing process. [Unidentified, Bunbury]</p>	<p>These concerns are real and will have to be overcome if the OCP Plan is to be successfully implemented. To get people to take part will require clear communication of the benefits, and of the risk of not taking part.</p> <p>We can learn from existing processes.</p>
<p>7 I am concerned about transport – farmers putting material in the back of the ute – it may be better to have someone come to the farm to collect. [Trevor Ranford]</p>	<p>This may be an option in some areas, but would be expensive if universally applied.</p>
<p>7 I run farm chemicals courses through Farmcare. 3-5 people out of each group of 18 (30 courses) have OCPs. A typical holding of all unwanted chemicals, including OCPs, is 30€L. [Andrew Nicholls]</p>	<p>This is valuable information which indicates that the problem is still widespread, and gives some idea of its scale.</p>
<p>7 Those farmers whose markets were threatened took full part in OCP recall (meat producers). Horticulturalists did not respond so well. [John Andre]</p>	<p>This was probably a common pattern.</p>
<p>7 To what extent are these materials going to be found in SA business and in homes rather than farms? [Andrew Thiele]</p>	<p>We are not really sure. Provided that holdings are not large, small business may well be treated in the same way as individual holders.</p>
<p>7 Do we have any facilities in the NT that would be suitable for consolidation stores? [Louise Fuller]</p> <p>I recall from the previous forum that someone thought there was one at Hidden Valley. [Louise Fuller]</p>	<p>NT Department of Primary Industry has indicated that it does not believe there are any currently. Any facility built would need to be cyclone-proof.</p>
<p>7 At Alice Springs, a clean-up day was held, but at the end, there was nowhere to put the stuff, which left a question over whether this was a bigger problem than leaving the waste scattered in smaller pockets. It is important to make sure we have suitable storage before collecting these wastes. [Gerry Wood]</p>	<p>Section 4.4 of the OCP Plan requires that collections not commence until a consolidation store is in place.</p>
<p>7 From time to time, hazardous waste is transported from Tasmania to Victoria for storage awaiting treatment. It is not regular but on a needs basis. The waste includes OCPs and is picked up from farms. [Pat Deprez]</p>	<p>Noted.</p>
<p>7 Farmers want small containers that are returnable. [Sarah Moles]</p>	<p>Noted. Small containers will tend to result in smaller quantities of chemicals becoming unused, unwanted. This is really a matter for future management of rural chemicals rather than dealing with present holdings.</p>

Community Comments	OCP Consultation Panel Responses
7 In future, farmers will be required to use returnable containers – penalties will be invoked if they do not. [Roy Smith]	The Industry Waste Reduction Agreement will help change farm practices but it is not compulsory. This is really a matter for future management of rural chemicals rather than dealing with present holdings.
7.1 The final paragraph is very good motherhood, but fails to recognise that on-farms containers are aging, leaking – needs to be addressed urgently. [Michael Nicholls]	A critical issue – the Panel expects that there will be advice and some practical assistance in handling, as outlined in section 3.3 of the OCP Plan.
7.1 Is there a need somewhere in the document to reference Australia’s international obligations (eg in relation to persistent organic pollutants)? I think it would be worthwhile putting up something on this, as cross-boundary issues may arise. [Ian Coleman]	Agreed – Section 2.6 (now 2.8) has been amended.
7.1 In previous collections, where collection points were located for some time in an area, chemicals were left (overnight) when a collection point was unattended. [Arthur Devin]	Efforts should be made through the education program to strongly discourage such practices.
7.1 What is the relationship of the OCP Plan to the NEPM on the Interstate Movement of Controlled Waste? [Evan Boardman]	The two will have to be consistent and interrelate. However, note that scheduled waste is only a small component of all hazardous waste, and that most hazardous waste is treated in the State/Territory of generation.
7.1.1 There must be strict provisions to ensure that transport of large quantities of waste does not occur without controls. [Rob Meney]	These are provided for in Section 5.1.1 of the OCP Plan..
7.1.1 Transport of Dangerous Goods Regulations require a written emergency plan to be compiled and approved by the Ministerial Council. This condition should be identified within the OCP Plan to demonstrate a commitment to public safety and environmental issues should an accident occur.	This section (now 5.1.1) requires the ADG Code and any other relevant legislation (and consequently any provisions of such legislation) to be complied with. It would make the OCP Plan unwieldy to detail provisions contained in the relevant legislation.
7.1.1 I am concerned that if you call up the ADG Code, a farmer will have to placard the vehicle to transport waste. This is not necessary. [Bernard Milford]	The ADG Code only applies to amounts of 250 kg or above, which is more than is likely to be found on most farms.
7.1.1 Do OCP holders have the full awareness necessary to make judgments in relation to transport in accordance with Dangerous Goods legislation? [Bruce Davis]	Most holders would not have huge quantities of chemicals so would not trigger the Dangerous Goods legislation but education and advice will be supplied.
7.1.1 Where do transport provisions in the plan apply, collection or storage? In addition, at what stage do existing Victorian statutes apply? [Bob Handby]	Because of quantity requirements in the ADG Code, the transport provisions are most unlikely to apply prior to receipt at collection points. Existing Victorian statutes apply while the waste is within the jurisdiction of Victoria.

Community Comments	OCP Consultation Panel Responses
<p>7.1.2 AS2507 is being rewritten. [Iain Chalmers]</p> <p>AS4252 has been developed to cover hazardous chemicals. [Peter Rutherford]</p> <p>The Standard is being rewritten – a new Standard has also been written, developed by officials from Dangerous Goods. I believe new Standards are less representative of vested interests. [Jeff Stanfield]</p> <p>A new Standard which is more user friendly will be published in August on ag/vet chemicals. [David Jesse]</p>	<p>This section (5.1.2 of the completed OCP Plan) has been amended to make provision for changing standards (see footnote 7).</p>
<p>7.1.2 Are the chemicals likely to be found covered by the provisions noted in the Plan, ie. AS2507? [Peter DiMarco]</p>	<p>The ADG Code does not cover the small quantities likely to be found on farms. There will be a need to provide supplementary information for chemical holders to ensure safety as provided for in Section 3.3.</p>
<p>7.1.2 Include an explanatory note (footnote) that Australian Standards do not cover all the necessary requirement for transporting the waste. [Peter DiMarco]</p>	<p>An addition to the plan was considered, but the Panel felt that this section (now 5.1.2) already implied that the Standards were only part of the provisions of relevant legislation.</p>
<p>7.1.2 How can we be sure that the Australian Standards are not developed in such a way as to represent the vested interests of particular parties? [Alec Smith]</p>	<p>We need to accept the Australian Standards as they are. Under the OCP Plan the agency can set the conditions.</p>
<p>7.1.2 Standards are of an advisory nature and not called up by legislation – but they are far too technical, particularly for farmers. [Colin Daly]</p>	<p>Any communication that we use will have to be written in a language that the holders can understand.</p>
<p>7.1.2 Australian Standard on storage and handling is very inadequate, needs improving. [Leon Salinas]</p>	<p>A revised standard is in preparation.</p>
<p>7.1.2 What is the quantity limit for scheduled waste in relation to storage of dangerous goods? [Adrian Lewis]</p>	<p>The Dangerous Goods storage provisions apply to larger holdings, such as may be found at consolidation stores. Advice on these matters will be incorporated into communication programs.</p>
<p>7.1.2 No mention of third standard in existence: Standard AS4452 Safe Handling of Poisons. [Christopher Stebbing]</p>	<p>Noted. It was established before the OCP Plan was finalised that this does not contain anything specifically relating to chemicals.</p>
<p>7.2 I live in Walgett Shire – could rail be used? [Pam Moore]</p>	<p>The volumes of waste are unlikely to be sufficient to make rail transport practical.</p>
<p>7.2 Stipulate specific zones, eg. farm, collection point, consolidation point and destruction facility, instead of “workplace”. [Peter DiMarco]</p> <p>Farms are considered workplaces by Worksafe. [Rob Meney]</p>	<p>Worksafe regulations cover all workplaces, including farms.</p>

Community Comments	OCP Consultation Panel Responses
7.2 Occupational Health and Safety (OHS) provisions under 7.2 apply to all workplaces, including farms, regardless of quantities stored, and there is no threshold in the case of dangerous goods – this is impractical and won't work in rural Australia. [Michael Nicholls]	Noted.
7.2 Are all OHS regulations suitable? [Frank Ondrus]	All States' OH&S legislation includes duty of care. New regulations for handling hazardous substances are being introduced in all States.
7.2 Material Safety Data Sheets (MSDSs) are supposed to come with product – this does not occur in Toowoomba. [Frank Ondrus]	It is up to employers to provide MSDSs for all hazardous materials handled in the workplace. Householders/farmers can obtain MSDSs by approaching manufacturers/suppliers.
7.2 Householder may not know to ask. Should it be made compulsory for manufacturers to supply MSDS?	This would be a massive job for manufacturers, but it wouldn't hurt them to inform customers that MSDSs were available.
7.2 OHS practices vary from State to State – the OCP Plan needs a national approach – there needs to be some national OHS standard reference in the Plan. [Craig Darlington]	Existing OHS laws are a State/Territory function.
7.2 How do you define a work place? – Industrial environment – however, most are farms and small business and OHS rules are loosely applied. [Craig Darlington]	State/Territory OHS laws define the work place.
7.2 There is a need to train farmers to understand their roles as employers and that farms are workplaces. [Roy Smith]	Agreed. All farmers acting as employers need to be aware of their responsibilities in this regard.
7.3 There is a need for more explicit words on segregation – if the chemicals are obviously OCPs, no problems, but if their identity is uncertain, then clearer words are required. This section must include line (c) for 'other unknown waste'. [Peter Rutherford] There are 2 categories for segregation – what about other known materials, eg from farms and households? [Brian Crane] There are two other categories which need to be dealt with – non-OCP known chemicals and unknown chemicals – the plan will fail if it doesn't allow for this. [Jim Straker]	Agreed – this section (now 5.3) has been expanded considerably in an attempt to make this clearer and includes a line for unidentified material.
7.3 Some clients have no idea what they are handing in, and containers might not contain what labels indicate. [Geoff Thomas]	The Panel believes that this is not uncommon. Educational material is under consideration to assist people in safe management of unidentified chemicals prior to collection.

Community Comments	OCP Consultation Panel Responses
<p>7.3 Prepare labels that can be sent to farmers so that they can label any drums they have, with information that may be useful for identification. This would make clients think more carefully about what chemicals they have. [Rob Meney]</p> <p>There would need to be assistance for farmers to do this. [Peter Wahlsten]</p>	For consideration during the implementation program – care would need to be taken to ensure that important information on the container was not obscured or destroyed.
<p>7.3 Storage issues are handled by Dangerous Goods/Department of Industrial Affairs so SA EPA will need to consult closely. [Jeff Stanfield]</p>	Responsibility for implementation for aspects of the Plan will need to be shared between a number of government agencies.
<p>7.3 There are three categories of chemicals in sheds including unknowns which are a concern. [Peter Philp]</p>	Educational material will need to address this.
<p>7.3 For a central storage point on a regional basis – what are local requirements? [John Howarth]</p>	It is envisaged that in most circumstances existing facilities would be suitable for use.
<p>7.3 Are you going to be able to specify requirements for collection points and consolidation stores – safety, security, supervision? [John Beard]</p>	This will be for States and Territories to do.
<p>7.3 How do you get information to holders? [John Howarth]</p>	We believe that the best way is through using local and regional level networks to spread educational and information materials.
<p>7.3 There are a lot of chemicals out in the community which are not identifiable – there is a need for some identification system, some interim storage of chemicals received from the community until they have been identified and can be disposed of appropriately. [Gary Smith]</p>	Agreed.
<p>7.3 Very little OCP is labelled in a way that is clearly identifiable other than by those well-informed on this matter. [Michael Nicholls]</p>	A fact sheet on trade names is available from the Waste Management Secretariat. To the Panel's knowledge, this is the best listing so far.
<p>7.3 There is no precautionary caveat on managers of collection points – a clause is needed to require segregation as though material were unlabelled. [Peter Waterman]</p>	This point should be covered in detailed procedures during the implementation phase.
<p>7.3 It is undesirable to have farmers and householders consolidating as well, but there is nothing in the plan on this – it needs to be clear that consolidation is to happen further up the chain than this. [Michael Nicholls]</p>	Holders have been added to Section 5.3, with respect to keeping materials segregated.
<p>7.3 Have there been surveys on the identity of products?</p>	Yes.
<p>7.3 Is there a risk involved because of mixing different chemicals?</p>	This should be minimised by having trained personnel at collection points and in consolidation stores.
<p>7.3 I visited Redilin Farms – I was surprised at the number of items that had been left from owner to owner. [Leon Huinck]</p>	Materials are often found during/following change of ownership.

Community Comments	OCP Consultation Panel Responses
7.3 A lot of unidentified chemicals will come in. [Ray Macnamara]	Agreed.
7.3 Will there be a national register of collection points? [Craig Darlington]	This will be dealt with on a State and Territory basis.
7.3 Mixing of chemicals is a problem – what is your reaction to State governments that do this and landfill? [Miles Blake]	Any landfilling of non-scheduled OCP waste will need to be consistent with the OCP Plan. Scheduled OCP waste must not be landfilled.
7.4 There is a good case to assess the adequacy of current legislation and regulations. I am concerned that some farmers are burying chemicals rather than using proper management. [Steve Benzie]	Others have brought this view to the Panel, too. This is probably an education issue as much as a legal/enforcement issue.
7.4 This section should include instruction to call Worksafe for information. [Rob Meney]	Worksafe can supply details to those people who want them. Agreed that such information should be included in information generated by the agency for holders.
7.4 Containers have deteriorated in 10 years since OCPs were banned – how can storage and handling advice be useful. [Bill Bishop]	This advice would need to take possible reduced container integrity into account. Professional help may be required in cases where the containers have seriously deteriorated.
7.4 A damaged container was found on a property, maybe because the holder did not know what to do with it. [Bill Bishop]	It is recognised that the holders will need user-friendly advice on handling as soon as possible.
7.4 You can cut the top off a plastic 20 L drum to act as an overdrum to hold deteriorating tins. [Bill Bishop]	Good idea.
7.4 What sort of process is in place to educate people in the properties of chemicals they have on the farm, without frightening them? [Michelle Brenton]	Considerable skill will be needed to produce educational material.
7.4 A recent issue of Aware (WorkCover magazine) provides a significant level of information on chemicals management. [David Jesse] This has been distributed widely. [Colin Daly]	Noted. Secretariat has a copy.
7.4 Will there be an information sheet on how to minimise things you might find in the back shed? [Philippa Rowland]	High priority has been given to providing advice to people who do have waste stored on farms etc prior to any collection scheme. Care needs to be taken with minimising waste volumes, however, as this could lead to difficulties with eventual destruction if incompatible materials are mixed.
7.4 For farmers, will there be guidelines on how to get material to collection points? [Ivan Diggs]	Yes.

Community Comments	OCP Consultation Panel Responses
<p>7.4 Will Material Safety Data Sheets (MSDSs) be given to holders? [Cormack Dunn]</p> <p>Most of the chemicals to be collected are old chemicals and their containers may no longer be labelled – there are no MSDSs for old chemicals. There need to be generic guidelines for chemicals with no MSDSs. [Roger Toffolon]</p>	<p>Something more directly relevant to holders would probably be given to start with, while flagging the availability of other material for those who want it.</p>
<p>7.4 There are some people who know they have OCPs there, but labels have disappeared from some containers, and there are also people with no idea what they have there. Unless an amnesty is introduced, collection will be a waste of time. [Bob Barwell]</p> <p>The question of whether these materials are legal or illegal is silly – presumably at one stage they were legal and bought in good faith – people should not be penalised. [Unidentified, Dubbo]</p>	<p>During the previous round of consultations, there was a dichotomy of views on an amnesty (and it was not only regulators who were opposed to the idea, either). Careful consideration will need to be given to the wide range of views on this matter, but there can be no question of a formal amnesty because it implies wrongdoing and could impede cooperation. (See NSW EPA advice in response to comment from John Beard on Section 5.1.)</p>
<p>7.4 The issue is broader than whether to bring OCPs in now or not – there needs to be a disincentive for people to hang on to them and use them at a later date. Otherwise, 10 years down the track, we could be going through the same exercise as this – we must get the chemicals in now. In Gunnedah, water testing has found DDT and Dieldrin in water – we don't know how long it has been there, but we need to avoid this in future. We need legislation to penalise, a fixed amnesty period – we must reduce future risk. [Paul Handsaker]</p>	<p>It may be a soft, supportive approach to start with and a more regulatory approach later on.</p> <p>We have obtained the preliminary summary of results for the Gunnedah testing. The main focus of this study of raintank water was the pesticide endosulfan, and the results – while below the maximum residue limit (MRL) of 40 ppb – varied with distance from the nearest possible sources. In a few samples, DDT and dieldrin were detected at low levels which probably derived from uses which ceased some years ago. NSW EPA will use the information obtained from this work to encourage industry to progress implementation of codes of practice for pesticide use and risk management strategies to minimise the probability of off-site movement of pesticides.</p>
<p>7.4 Some people might hang on to a little bit for use – how can we prevent this? [Pam Moore]</p>	<p>Through information programs and peer group pressure.</p>
<p>7.4 Emergency containment and clean up should also be included in advice in 7.4. E.g. what should be done about containers leaking in the back of a ute? [Geoff Sullivan]</p>	<p>Agreed – there is a need to include advice for such situations.</p>
<p>7.4 Could containers be transported in overdrums? [John Beard]</p>	<p>This has been suggested in many places. This option is likely to be available under the NCSDS.</p>
<p>7.4 There is always a possibility that different agencies might provide conflicting advice – this is especially likely to be a problem for farms near State borders – I suggest the inclusion of wording that requires the agency to prepare advice in cooperation with ANZECC. [Ian Coleman]</p>	<p>Agencies will need to consult with each other and other relevant government bodies. The workshops in Stanthorpe and Canberra gave particular attention to cross border issues, and it was pleasing to note increasing cross border cooperation on waste management issues.</p>

Community Comments	OCP Consultation Panel Responses
7.4 There is a need to assure farmers that there are no penalties for holding these chemicals, so they do not dump illegally. [Roy Smith]	Agreed.
7.4 Declare a moratorium. [Ray Macnamara]	To be considered as an option.
7.4 With farmers you must go softly, softly, be brief and simple – they need incentives, and the best one is peer pressure. [Miles Blake]	Agreed.
7.4 Trade risks should be emphasised in information programs. [Roy Smith]	Agreed.
7.4 Peer group pressure is already there through the implementation of QA systems. [Richard Ross]	Noted.
7.4 I am concerned that people will bring drums that are really damaged. [Bob Mitchell]	The advice which is developed should ensure that holders only deal with containers within their abilities to properly handle them; expert assistance may be needed in some cases.
7.4 Is there a technology available which could 'gel' chemicals to prevent them from running. [Roy Smith]	This is unlikely to be a preferred option because it may cause difficulties for destruction.
7.4 Use liquid nitrogen to freeze materials in poor drums. [John Armbruster]	Suggestion noted, but other methods of securing wastes (eg overdrums) are likely to be used in most circumstances.
7.4 There is a need to give more attention to the contaminated land issue and collection points. The regulator will require licensing for the transporter, depending on quantities. [Dagogo Ibiebele]	Noted. Holders mostly will not have quantities that will require their vehicles to be licensed.
7.4 With the WA 1980s collection, a fifth of the cost was redrumming. Can we get back to the agency to state how many drums we need? [Wayne Thompson]	Experience is that holding wastes for long periods often results in major costs for redrumming. Management of redrumming will be the responsibility of jurisdictions.
7.4 Local government landfills will be the most likely collection point sites; they are already considered contaminated sites. [John Hasted]	This option may be used in some areas.
7.4 Monitoring requirements for workers on site, and proper OH&S techniques for handling OCPs are required – I suggest a national set of regulations. [Craig Darlington]	OH&S legislation and practices are State matters; guidance documents for handling are being prepared nationally.
7.4 Our Shire has monitoring of workers handling pesticides at their work place every six months. [Bob Mitchell]	Noted.
7.4 You need to let people know that it is going to happen in the future – identify their OCPs and store with care for this future collection. [Ray Macnamara]	Agreed.

Community Comments	OCP Consultation Panel Responses
<p>7.4 Government subsidies are available for communication in several languages – Croatian, German, etc. Health department gets government subsidies.</p> <p>People speaking other languages can ring up government interpreter services. [Trenchard Smith]</p>	For consideration during implementation.
<p>7.4 Many people are not literate in their own language and therefore need visual and oral aids. [Cath Stephensen]</p>	Noted.
<p>7.4 Brochures come to local council and if local government is queried to whom do they turn for advice? [Kylie McLachlan]</p>	This will need to be made clear in the implementation program.
<p>7.4 To avoid difficulty getting out to more remote areas and to provide language assistance, there is an ongoing chemicals training program throughout the State.</p> <p>14 000 farmers trained through Farmcare in Queensland, estimated to cover half of farm units (est 24,000 farm units in Queensland total). Information could go out to farmers through the existing training programs. [Jamie Cupples]</p>	Useful information for implementation.
<p>7.4 Are you aware of a survey by Avicare? [Jamie Cupples]</p>	Yes.
<p>7.4 How do we get messages to householders who find OCPs when someone dies? [Leon Solinas]</p>	Advice needs to be developed that is appropriate to householders as well as farmers and businesses.
<p>7.4 Councils are using advertising on rates notices as an income stream. [Mark Hoogsteyns]</p>	To keep costs of any collection schemes within bounds, major emphasis will be on unpaid advertising mechanisms.
<p>7.4 Rate notices only get to house owners. You need to use migrant resource centres. [Peter Brock]</p>	Noted.
<p>7.4 Because it is so long since the last collection (1987), one problem is aging of packaging. This could be a problem at collection points; we now have better materials to prevent spillages (eg banded pallets). [John Ready]</p>	Noted.
<p>7.4 Does the ownership and liability pass with the waste? [Rob Curtis]</p>	The matter of liability has not been finalised, but will need to be made clear prior to collection.
<p>7.4 In relation to very old OCPs, is there an inspection provision prior to the transport where containers could break? [Peter Valentine]</p>	Advice on this and other matters will be provided to holders so as to secure the contents of fragile containers. In a small number of cases it may be necessary to provide professional assistance. In general, it is not envisaged that pre-transport inspection will be offered.

Community Comments	OCP Consultation Panel Responses
<p>7.4 The following were suggested as information vehicles at the Hobart workshop:</p> <p>Agricultural shows and festivals, ag/vet suppliers. [David Judson]</p> <p>Company representatives, community health services and GPs. [Rohan Kile]</p> <p>Waste contractors and their invoices, rural youth, sporting clubs. [John Brennan]</p> <p>Grower and Farmer associations through mail-out and Internet and links to Farmers Federation home page – Eureka web site. [Peter Valentine]</p> <p>Pubs and hotels, word of mouth are far more effective. Environment Tasmania also have a web page which could be opened for public information. In any case the important factor is to understand the target audience then develop strategies to get the message across. [Jocelyn Phillips]</p> <p>WorkCover and DPI. [Ruth Paterson]</p> <p>Community and neighbourhood centres. [Lara Giddings]</p> <p>Use State of the Environment reporting to communicate. [Stephen Waight]</p>	<p>Noted as suggestions in addition to Agsafe, Farmcare, Cattlecare, schools, councils, clubs, CRCs, Landcare, catchment groups, CWA.</p>
<p>7.4 If OCPs are found in relatively small quantities during collections, then there should be greater attention paid to this in education and awareness programs. [Jocelyn Phillips]</p>	<p>Agreed.</p>
<p>7.4 Education and awareness should be altering people's attitudes and values. This does not seem to be happening, particularly where farmers won't hand in chemicals. Chemical holders should be encouraged to take responsibility for their operations. [Jocelyn Phillips]</p>	<p>Noted.</p>
<p>7.4 OCPs and unknowns in garden sheds are an issue which requires an education and awareness program. [David Baker]</p>	<p>Agreed.</p>
<p>7.4 Because farmers could use collection to dispose of all chemical waste, there should be clear guidance as to what the collection program is seeking. [Tony Britt]</p>	<p>The scope of collections may vary from region to region, but information on what is to be collected must be clear.</p>

Community Comments	OCP Consultation Panel Responses
<p>7.4 Guidance should be given to chemical holders on what to do if containers break or there is spillage.</p> <p>I believe that farmers should have a guidance note for dealing with chemical spill sites. [Tony Britt]</p>	<p>Agreed.</p> <p>To be considered in implementation phase as part of advice under 7.4.</p>
<p>7.4 Farmers would not be aware that mixing arsenicals with other pesticides creates larger problems in treatment and destruction. [John Hogan]</p>	<p>This will be an essential message to convey in the information program.</p>
<p>7.4 Chemical awareness is good but the infrastructure is deficient.</p> <p>Deceased estates are a big problem for councils where chemicals are found in the shed and are in a poor state or are unidentifiable. [Allan Bonollo]</p> <p>I agree and suggest that some form of legal authorisation be given in the case of land sale where chemicals are found on the property. [Bruce Burrow]</p>	<p>Noted.</p>
<p>7.4 Most holders, particularly in rural areas, would be 50-60 year old males who consider the shed their preserve. Perhaps we need a “Shedcare” program? [Sue Nixon]</p>	<p>This will need to be considered in the implementation phase.</p>
<p>7.4 It is better to encourage people to keep the chemical at home. Is the risk of leaving chemicals on a slab in old containers less than the risk of transporting them? [Gerry Wood]</p>	<p>Storage is not a permanent solution. These chemicals need to be destroyed. With appropriate care, these materials can be transported safely.</p>
<p>7.4 Americans have put out a handbook with trade names, etc which is very comprehensive. [Rob Fischer]</p>	<p>The Merck Index also contains such information.</p>
<p>7.4 1400 Country Women’s Association (CWA) members will receive a report on this forum. CWA is linked to rural youth, schools, Agfest, community groups. The information will be disseminated through CWA to a large sector of the community. [Jean Wilby]</p>	<p>Noted.</p>
<p>7.4 The national program should not continually refer to ‘the agency’ – there is a need for at least national guidelines. [Craig Darlington]</p>	<p>National advice is being developed by the NCSDS Steering Committee, which includes Commonwealth, State and Territory representatives.</p>
<p>7.4 Who will produce the advice in 7.4? [Rob Curtis]</p>	<p>The NCSDS Steering Committee is developing a guidance document on the matter.</p>

Community Comments	OCP Consultation Panel Responses
<p>7.5 Is Section 7.5 meant to read that managers of collection points are responsible for spillages/clean-up? Who is responsible for clean-up outside collection points? Across ACT/NSW, the fire brigade is responsible for emergency chemical clean-up – I think that they should have some sort of role. [Darrell Thornthwaite (ACT Emergency Services Bureau)]</p>	<p>The emergency services combat agency within each jurisdiction is to be responsible for clean-up outside collection points.</p>
<p>7.5 Have you thought of transportable hazardous waste units? [Wayne Thompson]</p>	<p>Mobile collections may be used in some areas but it is not thought that they are likely to be the main form of collection.</p>
<p>7.5 Who will train people who will manage collection points? There is a need to liaise with fire service and companies which may have suitable facilities. [Barry Johnston]</p>	<p>The agency will facilitate and oversee training programs (see Section 12.3)</p>
<p>7.5 Avcare people have good packages on emergency procedures, which can be modified to incorporate advice coming through the agency. [Cath Stephensen]</p>	<p>For consideration during implementation.</p>
<p>7.5 Many companies are scared of reporting spills to authorities. Most people don't know what organochlorines are – they all know what Dieldrin, DDT etc are, but not OCPs – so you need to use language that people understand. [Charlie Halloran]</p>	<p>Noted.</p>
<p>7.6 Infrastructure costs for storage will be large. [Tim Hunter]</p>	<p>Possibly, but not necessarily, depending on how one approaches it.</p>
<p>7.6 Provisions of the Dangerous Goods Act will come into play. Storage in a town would be regulated in WA but on farm or outside the town little or no regulation would occur. [Peter Rutherford]</p>	<p>There will be some variation from State to State.</p>
<p>7.6 Each shire could not afford to construct a shed for a short-term collection program. [Cameron Rogers]</p>	<p>This will focus attention on alternatives, including the use of existing infrastructure.</p>
<p>7.6 Shires must have existing storage sheds so there is no cost in building a collection point. If one shire does not have infrastructure it could use neighbouring shire facilities. [Sandy Lyons] It seems to me that we're talking about small quantities – if that is the case, I don't see why they can't be stored in existing facilities. [Colin Sims]</p>	<p>It is expected that many shires will have sheds that would be of a suitable design to be used for a temporary collection point.</p>

Community Comments	OCP Consultation Panel Responses
<p>7.6 I am concerned that 7.6 is not fully consistent with the intent of 7.1.2. The document makes this unclear. [Peter DiMarco]</p> <p>Add words to the effect that under some circumstances there may be variances to 7.1.2. [Peter Wahlsten]</p>	<p>Section 7.6 (now 5.8) qualifies Section 7.1.2 (now 5.1.2).</p> <p>This would only occur within the limits defined by the OCP Waste Management Plan and with full consultation as outlined in Section 5.8.</p>
<p>7.6 The wording presupposes that this is the way collection will be undertaken – it could be farm to farm visits. [Colin Daly]</p>	<p>It is envisaged that fixed collection points will generally be used, but this does not prevent collection vehicles visiting individual holders.</p>
<p>7.6 Do we know the quantities likely to be found? This would assist in the development of the program, particularly in relation to storage and handling requirements under Dangerous Goods. [Jeff Stanfield]</p>	<p>No, only rough estimates are available, and this situation is unlikely to change.</p>
<p>7.6 Collection points need to be sited to include local industries and existing infrastructure such as local council sheds. [Trevor Anthony]</p>	<p>This will be a matter for local decision.</p>
<p>7.6 Can we have more flexibility in regulations? [John Howarth]</p>	<p>Section 5.8 looks at practical implementation of regulations by the agency in consultation with communities.</p>
<p>7.6 When it comes to storage of collected OCPs at local government level, will there be a commercial point to store collected chemicals? – I have in mind banded store. [John Howarth]</p>	<p>This is a possible option.</p>
<p>7.6 Would it be helpful to have some kind of checklist for local councils to check against to determine whether they might already have suitable facilities for storage? [Philippa Rowland]</p>	<p>Good idea for consideration by the agency.</p>
<p>7.6 Do Weeds Councils have sheds? [Unidentified, Dubbo]</p>	<p>Not all.</p>
<p>7.6 Irrespective of who owns the waste, local government needs to be reassured that facilities will not become long-term dumps –contractors for storage facilities should be required to lodge a bond to guarantee that the site will be cleared within x months. [Peter Wong]</p>	<p>This could be one mechanism.</p>
<p>7.6 I don't see anything to make sure that the manager of a collection point is capable of doing the job – there needs to be some sort of accreditation/certification. [Gratton Wilson]</p>	<p>At least basic training will be necessary, using existing services where possible.</p>
<p>7.6 I have seen local and State governments dodge, duck and weave on these sorts of issues, largely because of potential liability – if local government is to be responsible for collections, it will be important that the agency indemnifies local government. [Paul May]</p>	<p>This will be referred to the agency (in all jurisdictions) for consideration.</p>

Community Comments	OCP Consultation Panel Responses
7.6 The Plan would be enhanced by a diagram showing responsibilities in sequence from holder up through collection points, consolidation stores etc. [Peter Waterman]	It was felt to be more appropriate to include this in the educational material to be prepared.
7.6 Requirements for collection points are not likely to be too onerous for councils. [Mark Gorta]	It is important to attempt to ensure this outcome.
7.6 Queanbeyan City Council has bunded liquid storage available – but what requirements are you going to set for collection points? To meet the Australian Standard is likely to cost money – you may need to have a temporary standard for collection points to make them feasible. [Phil Hansen]	This will need to be worked out with the agency and in consultation with the community as outlined in Section 7.6. It may be necessary to consider a range of different approaches to suit different places.
7.6 Who is going to be in charge of these collection points? A lot of things are coming under the environmental health officer – would like someone else to come and look after the collection. [Bob Mitchell]	It is envisaged that most collection points will be managed through local government, supplemented by external expertise when necessary.
7.6 Temporary collection will still require containment and bunding. [Cath Stephensen] Temporary sites, will they have bunding? Who approves the site? [Frank Ondrus]	We would expect temporary collection sites to have bunding. The site requirements will be determined by the agency following consultation processes outlined in Section 5.8.
7.6 Collection will be difficult – you will have to go and collect (trucks) – people will not come to collection points. [Ray Macnamara]	This option may be used in some areas, but not generally.
7.6 No confidence that the Queensland agency will regulate the process adequately, including destruction not burial. [Miles Blake]	Opinion noted.
7.6 The agency is usually the EPA, and expertise lies in the Agriculture Department and emergency services of the local area. [Craig Darlington]	Coordination will be required in the implementation plan.
7.6 Collection points and consolidation stores should be placed on already contaminated sites to prevent further generation of contaminated sites. [Miles Blake]	This work should not result in any further contamination if due care is taken with collected material.

Community Comments	OCP Consultation Panel Responses
<p>7.6 The quantities are not going to be large in this local area (Ayr). Many resellers have suitable facilities. Why not use reseller facilities to run the program? There would be a cost on local sellers, so resellers can't be expected to do it for nothing. There are several in the local district – need to choose one. [Rod Schultz]</p> <p>A small number of resellers would be needed. Using anyone but resellers is duplicating facilities. I would be happy to take these materials into my store, but would need to be assured that they are passed on quickly. [John Ready]</p> <p>Are resellers easily accessible for farmers? [Kylie McLachlan]</p>	<p>Some resellers have indicated a preparedness to do this, but the majority do not wish to become involved in this way.</p>
<p>7.6 I believe that you are putting the cart before the horse by collecting materials until you are able to deal with them. [Jamie Cupples]</p>	<p>This may be a problem, but if we wait for absolute certainty, we will never start.</p>
<p>7.6 If there is a lessening of standard for temporary collection points, this could be a concern from a liability point of view. [Ann McLaughlan]</p>	<p>This question will need to be addressed in the consultation process described in Section 5.8.</p>
<p>7.6 Will the community have concerns for the location of chemical collection points whether they are of a temporary or long term nature? [Bruce Davis]</p>	<p>Very likely – which is why consultative procedures are provided in Section 5.8.</p>
<p>7.6 How can legislative requirements be bypassed to allow chemical collection points to be established? [Adrian Lewis]</p>	<p>Environment Tasmania advises that there could be exemptions under new Tasmanian environment legislation to allow collection points to be temporarily established. SA and Victoria can also give exemptions under their Acts to allow collection points to be established on a temporary basis.</p>
<p>7.6 Excellent proposal as full provision of the existing regulations in Victoria makes organisation of a collection very difficult. [Allan Bonollo]</p>	<p>Noted.</p>

Section 8: Destruction of scheduled OCP waste

Community Comments	OCP Consultation Panel Responses
<p>8 I would expect a collection point to be completely self-contained so there would be no possibility for discharge outside. A consolidation store should not be sited in the vicinity of a sensitive environmental zone such as a watercourse. [Trevor Teakle]</p>	<p>Agreed.</p>
<p>8 I think that 8.2, 8.3, 8.4 and possibly 8.5 belong in Section 7 rather than Section 8. [Norm Blackman]</p>	<p>Agreed and plan rearranged largely as suggested (though 8.2 [modified] now appears in the section on collections).</p>

Community Comments	OCP Consultation Panel Responses
8 Must the facility destroy to give less than 2 ppm? [Wayne Thompson]	As a solid residue – yes.
8 Who pays the \$8000 per tonne destruction cost? [Mark Hoogsteyns]	To be determined in the negotiation process in Section 2.7.1.
8 Would the waste from NT be moved interstate for destruction or would new facilities have to be built? [Carol Carttling]	Probably moved interstate.
8.1 Of chemicals collected in WA through the OCP recall, all should be destroyed by 1998. [Peter Rutherford]	Good news!
8.1 You need to clarify the starting date. [Michael Nicholls]	Section 2.7.2 is about as definite as can be stated in the plan.
8.1 I assume all wastes are prohibited for use? Many of these chemicals are on a UN list, and come under international law. [Lena Aahlby]	Quintozene is still permitted for restricted use, and Lindane on pineapples. There is no ‘international law’, but agreements about phase-out are under discussion (see Appendix A to the OCP Plan).
8.1 What is meant by the term ‘agency’. Where is this defined? [Ian Manley]	‘Agency’ is defined in Section 1.1.
8.2 The manager of a consolidation store may not necessarily be the agency (ie as defined in 1.1). [Mark Gorta]	Agreed.
8.2 I am concerned that a council could provide a storage facility and then be stuck with it for the long term. [Unidentified] What guarantees will there be for managers of collection points that they’ll be able to dispose of the collected waste in a reasonable timeframe? [Bob Wroth]	Section 4.4 specifies that collections should not take place until a consolidation store is available. Section 5.5 specifies that scheduled OCP waste received at collection points is to be consigned to consolidation stores as soon as practicable and within a maximum of six months.
8.2 There are degrees of relative hazard – is it better to have waste at a collection point rather than on farms? [Peter Wahlsten]	Yes.
8.2 Is the time frame dependent on destruction capacity? [Roy Smith]	Residence time at consolidation stores, but not at collection points, will depend on destruction capacity.
8.2 Clear and well defined timelines are essential for an effective collection program. [Uldis Neilands]	Agreed.
8.3 As a reseller I am prepared to collect, but would want the materials out of the store within a week. [Paul Sgarbossa]	Noted.
8.3 The timeline should be as soon as practicable but within six months. [Chris Moon]	Agreed – plan amended accordingly. (See Section 5.5.)
8.3 Storage and handling will depend on the nature of collection points and quantities of chemicals collected – quantities and times for storage should be tightly controlled. [Steve Benzie]	The agency will have strong influence on quantities allowed to be stored at collection points, as will the local community.

Community Comments	OCP Consultation Panel Responses
8.3 How long will chemicals remain at a collection point if they can not be identified and need to be analysed? What happens to these chemicals. [Sandy Lyons]	If they can't be identified at the collection point, they need to be sorted out at the consolidation store. Time spent at the collection point will not be affected.
8.3 Shires are prepared to collect chemicals but only if they are transported out quickly.	This has now been provided for in Section 5.5.
8.3 Will quantities collected have an impact on timing, level of infrastructure and level of State involvement in the process? [Peter DiMarco]	Yes.
8.3 Flexibility is needed to ensure all farmers are involved in the program – particularly if large quantities of chemicals are found or to ensure process efficiencies are maximised. Hold a small quantity until a large quantity is collected then transport to consolidation store. [Peter Wahlsten]	These are matters for implementation region by region, but a large number of movements of small quantities from a collection point to a consolidation store would not seem sensible.
8.3 I suggest the words 'Any scheduled waste received at a collection point	Agreed – amended to 'Any scheduled OCP waste received at collection points
8.3 Can some flexibility be incorporated into the wording to cover the likelihood that different regions will collect their chemicals within different timeframes. [Andrew Thiele] Could exemptions be given to regions if they overrun the six month period? [Brigitte Schulz] I could not see the need for more than six months. [John Andre] In remote areas the cost of transporting chemicals will be much higher – should they be allowed to accumulate more before transporting? [Brigitte Schulz] Probably need less than six months but include flexibility. [Trevor Anthony]	The six month limit has been included in response to strong representation from local government – some areas may want a considerably shorter time.
8.3 From a local government point of view, there would need to be a statutory requirement to limit time of storage. [John Howarth]	Section 5.5 limits storage at collection points to six months. While the OCP Plan is not itself a statutory instrument, governments will be expected to implement its provisions through their legislative/regulatory regimes.
8.3 Can make it work so that it doesn't have to stay there 6 months. [John Davis]	Any time less than 6 months may be implemented by local agreement.
8.3 I have been through something like this before – it won't be limited to 6 months – it will end up years. [Philip Palmer]	This would be contrary to section 5.5 of the OCP Plan. Many existing collections have operated under time periods considerably less than 6 months.
8.3 Are you saying that there will be no collections until there are consolidation stores? [Michael Nicholls]	Collections can still go ahead, but they won't be under the auspices of the management plan.

Community Comments	OCP Consultation Panel Responses
<p>8.3 The issue is surely the need for the manager of the collection point to have an assured means of passing on material collected and temporarily stored at collection points and requirement for a consolidation store to accept this material.</p> <p>A better way of expressing 8.3 may be along the lines:</p> <p>“Scheduled OCP waste shall be accepted at a consolidation store as soon as practicable after notification of intended despatch by the manager of a collection point and in any case within 6 months of such notification.” [Michael Nicholls]</p>	<p>We believe that most local governments would want the waste moved out of collection points within six months of receipt, rather than allowing for up to six months after they indicate they want to move it to a consolidation store.</p>
<p>8.3 I know grain growers – the collection point has to be cleared quickly – they are prepared to take them there, but not leave them there for a year. [Miles Blake]</p>	<p>Collection points will not hold waste for more than 6 months.</p>
<p>8.3 Is there a link between 8.3 and 7.6 – is 6 months a realistic time period? [David Judson]</p>	<p>Yes – but there will be regional variability.</p>
<p>8.3 I can envisage a situation where chemicals have been collected but with no avenue to remove them so are stored long term at a landfill shed. [Unidentified, Bunbury workshop]</p>	<p>The OCP Plan recognises this and now sets a six month limit for storage at collection points (Section 5.5).</p>
<p>8.4 What happens if commercial destruction facilities are no longer available? There needs to be some flexibility with this statement because some elements of collection, storage and destruction could change drastically – or the statements may be unclear to the reader. [Peter DiMarco]</p>	<p>The section states that the time limit does not apply if viable destruction facilities are not available in Australia, ie it incorporates some flexibility.</p>
<p>8.4 Are you asking people to destroy waste within a particular timeframe without infrastructure? [Ian Coleman]</p>	<p>Section 5.6 now has a caveat to cover this.</p>
<p>8.4 It is important to have both a clear starting and ending date for the destruction process. [Bob Handby]</p>	<p>Opinion noted but it is not possible to give specific fixed dates at this stage because not all of the waste is able to be destroyed at present.</p>
<p>8.5 How does exporting some materials stand with Basel Convention? [Frank Ondrus]</p>	<p>Under the Basel Convention, export of scheduled OCP wastes is permitted with the consent of the destination country, provided that the exporting country is satisfied that the destination country has facilities capable of disposing of the waste in an environmentally sound manner. In Australia, any export would occur under the Commonwealth Hazardous Waste Act, and must conform with the Basel Convention. Current Commonwealth Government policy is to allow exports only in exceptional circumstances, and Commonwealth Environment Ministers have been most reluctant to issue export licences for hazardous wastes.</p>

Community Comments	OCP Consultation Panel Responses
8.6 Ensure cross referencing between 8.6 and 7.3. [Peter Rutherford]	This was not considered to be necessary.
8.6 Which regulatory authority will police this matter? [Tim Hunter]	The agency, as defined in Section 1.1.
8.6 I am concerned about landfills, in particular Mt Walton. [Peter Wahlsten]	Only non-scheduled OCP waste can be landfilled at Mt Walton.
8.6 Is there any potential for bioremediation of OCPs? [Philippa Curran] Are there any biological processes being used? [Bruce Burrow]	These techniques are mainly used for soil remediation, but are unlikely to be feasible with the concentrated materials.
8.6 CSIRO is working on enzymes for destroying pesticides. So far, enzymes have been able to be used to break down organophosphates in the laboratory – OCPs are more difficult, but also on the agenda – potential applications including spraying enzymes on fruit to destroy residues and treating run-off waters/effluent from irrigation. [Robyn Russell]	It will be interesting to follow progress on this research.
8.6 The BCD Technologies plant in Brisbane is licensed for OCP destruction. [David Miles]	Noted.
8.6 How does cost of destruction compare with high-temperature incineration (HTI)? What about using cement kilns? [Bernie Milford]	Approximate cost for destruction in Australia is \$5-8 000 per tonne. This is similar to export to Europe for destruction by HTI. Using cement kilns for scheduled waste destruction at high concentrations seems most unlikely, though non-scheduled waste may be destroyed in some burners.
8.6 How do you dispose of the product from the BCD process? [Greg Stewart]	Salt is formed, tested and sent to landfill. The paraffin oil which needs to be present as a vehicle for this process comes out very clean, and goes to energy recovery.
8.6 What are the costs per tonne of each of the three methods BCD, Ecologic and Plasma Arc? What are costs of relocating mobile unit? [Evan Boardman]	Costs are broadly in the range \$5,000-\$8,000. Costs of relocating a mobile unit would vary widely according to location and quantities to be destroyed.
8.6 Can arsenic be managed in these processes? Can all OCPs be handled by each technology? [Adrian Lewis]	Arsenic cannot be destroyed by any of these processes and may cause problems as a contaminant, particularly for BCD. All OCPs can be destroyed by these technologies.
8.6 Why are there no destruction facilities in NSW? What do they do with their waste? [Ian Manley]	No operator has applied to build a facility in NSW. By agreement between States, waste is transported to one of the existing interstate facilities for destruction.
8.6 Contaminated chemicals, ie mixtures and unknowns, make treatment very difficult. I question whether the existing facilities could handle the waste. In addition, arsenic waste and arsenic mixtures have no known treatment avenue. [John Hogan]	Noted.

Community Comments	OCP Consultation Panel Responses
8.6.1 This does not say that the agency may set standards that are more stringent than those set down in the Plan. [Paul Davis]	True, but by setting standards which have to be met, the OCP Plan implies that the agency may set more stringent ones.
8.6.2 I want information about BCD and other technologies in general, particularly what happens to containers after chemical treatment. [Rob Meney] What happens to treatment residues and the container – are adequate mechanisms in place to manage this? [Peter DiMarco]	The plan is specific about destruction residues and these criteria will apply to any treated containers. Information about destruction technologies is provided in Scheduled Wastes Fact Sheet No 8, available from the Waste Management Secretariat. More detailed information is provided in the final review report Appropriate Technologies for the Treatment of Scheduled Wastes, published by the Commonwealth Government and also available from the Waste Management Secretariat.
8.6.3 Will facilities be monitored? – I am concerned about incidents that have happened – can we be sure that facilities are working as well as claimed? [John Beard]	Licence conditions should always include requirements for monitoring by the agency.
8.6.3 Has incineration been completely removed as a destruction option? [Bruce Burrow]	It is most unlikely to be pursued as an option.
8.6.3 Incineration may be a technically sound option but it is unacceptable politically. [John Hogan]	The Panel agrees.
8.6.4 Should exempt OCP waste be included in this? [Wayne Thompson]	This section (now 8.2.4) has been amended to include this point.
8.7 Need national guidelines, emission controls. [Craig Darlington]	Stringent minimum national standards for emissions are outlined in Sections 8.3 to 8.10 of the OCP Plan.
8.8 What is the criterion for exempt OCP waste? [Brigitte Schulz]	This is defined in Section 1.12.3 as 2 mg/kg.
8.8 What happens to liquids which do not meet the criterion for exempt OCP waste?	They have to go through the treatment process again, until they meet the criterion.
8.8 What are the breakdown products? [John Howarth]	With BCD, the products are degraded paraffin, (which is then used in furnaces), water and salt. With hydrogenation (EcoLogic), they are hydrochloric acid (which may be converted to salt) and methane (which is then burnt).
8.10 Plan should include a clear limit for wetlands. [Peter Philp]	Under Section 8.6, liquid effluent cannot be discharged to wetlands.
8.10 Is discharge to wetlands as part of sewage farm permitted? [Paul Smith]	Those ponds at sewage farms which are part of designated wetlands would be subject to the same conditions as other wetlands.
8.10 Prohibition of discharge to groundwater as well as wetlands should be included [Derek Collin]	This Section (now 8.6) has been expanded to ensure that agencies pay particular attention to the protection of aquifers in issuing licences for destruction facilities.
8.10 The definition of wetland includes creeks – NT planning regulations allow overriding of environmental restrictions where it is for a beneficial use – so it will be a question of beneficial uses. [Gerry Woods]	The Panel still believes that there should be no discharge from destruction facilities to wetlands (and the OCP Plan still prohibits this).

Community Comments	OCP Consultation Panel Responses
<p>8.11 Water standards are under review – I suggest reversing the footnote so that changes in standards are automatically picked up. Put the principle in 8.11. [Peter DiMarco]</p> <p>Are these numbers consistent with the new standards which may soon be released (marine and fresh water regulations)? [Philippa Curran]</p>	<p>Agreed – the plan has been amended in this way.</p> <p>This section (now 8.7) and the associated footnote have been revised.</p>
<p>8.12 This standard should not override State regulations. [Colin Daly]</p>	<p>This is a minimum standard so States can apply their regulations if more stringent requirements are needed. This section (now 8.8) has been amended to clarify that the NIOSH level shall not be exceeded.</p>
<p>8.12 We should be adopting emissions standards which are set at the stack rather than basing them on NIOSH values. [Alec Smith]</p>	<p>The agency will use standards such as NIOSH to develop limits for stack emissions.</p>
<p>8.12 Chemicals being destroyed kill plant and animal pests, yet emission controls for the destruction of those chemicals cover human health. Should ecological toxicity considerations be used? [Alec Smith]</p>	<p>The minimum standards set in this plan are much tighter than those set for many other industrial processes and are believed to afford a high level of protection.</p>
<p>8.12 The standards used are based on Worksafe and must be abided by under the Hazardous Substances Regulation. The standards in the Plan could not be enforced and the levels stated appear meaningless under existing State regulations. [Czes Grygorcewicz]</p>	<p>It is acknowledged that these standards could not be regulated under Worksafe since the Plan standards are tighter, but they would be regulated by the agency as part of the licence for the facility.</p>
<p>8.12 I am concerned and confused about who pays for the components of collection, storage and destruction and who is responsible for doing it and regulating it. [Tim Marshall]</p> <p>The funding issue should be clarified because the holder of stored chemicals does not want to suddenly be faced with large costs. This could result in inappropriate disposal to avoid these costs. [Trevor Ranford]</p>	<p>These matters will have to be determined through the negotiation process outlined in Section 2.7.1. However, individual holders will not be expected to pay the cost of collection and disposal.</p>
<p>8.12 Major hazard facility regulations, soon to be put in place, could cover the operations of destruction facilities. States may or may not designate a site as a major hazard facility. There is flexibility which includes room for community consultation. [Ivan Dainis]</p> <p>The SA EPA Act adds checks and balances for determining whether a site is a major hazard facility. [Geoff Sclare]</p>	<p>Destruction facilities are unlikely to be classified as Major Hazard Facility; the inventories are too small.</p>
<p>8.13 In referring to dioxins, how extensive is this provision? Who will pay for monitoring? What process will be used to set dioxin standards? [Peter DiMarco]</p>	<p>Monitoring requirements for dioxins will be set in the licence. EcoLogic, for example, already monitors and meets this requirement.</p>

Community Comments	OCP Consultation Panel Responses
8.14 Disposal to landfill of non-scheduled OCP waste from destruction facilities is authorised but the idea is not to put OCPs into landfill. [Craig Darlington]	The aim, as stated in this section (now 8.10), is only to allow exempt OCP solid waste from destruction facilities to be landfilled. However, there may be circumstances, such as with a waste that is difficult to treat, where an exempt OCP solid residue cannot be achieved. In such circumstances, the Panel sees it as preferable to allow non-scheduled OCP waste to be landfilled in accordance with Appendix B rather than leave the waste untreated. Note that any approval to do this must follow a community involvement process.
8.14 There are four well-managed landfills and six reasonably well-managed landfills in Tasmania. We will be seeking to improve at least one of those to ensure that non-scheduled waste can be disposed of to landfill. [Pat Deprez]	Noted.
8.15 There are no mobile facilities licensed in Australia – why include them in the plan if they are not available? [Craig Darlington]	There may be a proponent who wishes to use a mobile facility and obtains a licence for one. Note that the Brisbane BCD facility was once transported to North West Cape to treat waste.

Section 9: Disposal of OCP waste to landfill

Community Comments	OCP Consultation Panel Responses
9 A chemicals on farms guidance note is being developed which includes using lime pits on farms for the disposal of particular chemicals (Worksafe paper). [Colin Daly]	Such treatment is not appropriate for OCPs. On-farm disposal is unacceptable. It does not conform with the guidance note at Appendix B to the OCP Plan.
9 What should we be doing in the short term – should we still be accepting OCPs to landfill? [Mark Hodges]	No. In NSW, under the Chemical Control Order, nothing with OCPs at a concentration above 50 mg/kg is permitted to go to landfill.
9 If waste is suitable for landfill disposal, is it then suitable for incineration (2-50 mg/kg)? [Frank Ondrus]	In the PCB Management Plan, a guidance note was provided on the disposal (including incineration) of non-scheduled liquid PCB waste. A similar guidance note has not been provided for non-scheduled liquid OCP waste as the volumes are believed to be very small. Scheduled OCP waste should not be incinerated.
9.1 Is immobilisation an option for OCPs to allow disposal to landfill? [Scott Blacklow]	No, it is not – the intention is to destroy OCPs.
9.1 Is 50 mg/kg a known standard and what is it based on? [John Brennan]	This level has been negotiated through the scheduled wastes process and has been agreed upon by the jurisdictions and stakeholder representatives.
9.3 There are no ‘controlled’ landfills in SA. [Max Harvey]	Noted.

Community Comments	OCP Consultation Panel Responses
<p>9.3 I am concerned that we still consider landfill a suitable place to dispose of chemicals – what is considered an acceptable threshold level today may not be in future, and then people are left with the problem of clean up. [Michael Nicholls]</p>	<p>Section 9.1 prohibits the landfilling of scheduled OCP waste. 50 mg/kg is, we believe, the tightest level for this kind of thing in the world and only a limited number of landfills are suitable for this in Australia – this has been a practical management decision. Also, see the guidance note for the disposal of non-scheduled solid OCP waste at Appendix B to the OCP Plan.</p>
<p>9.3 Why not be explicit and identify landfills accredited for accepting non-scheduled OCP waste? [Paul May]</p> <p>One reason why we haven't identified specific landfills in the plan is that it could cause anxiety for people living near them if they know that those landfills might be targeted. [Paul Bainton]</p> <p>But people should know that those landfills are there. [Paul May]</p> <p>Yes, there is a duty of care. [Peter Waterman]</p> <p>Section 4.6 of the NCSDS Discussion Paper indicates that ANZECC's scheduled wastes strategy is based on principles of fairness, openness and equity – I think the case rests. [Peter Waterman]</p> <p>I see no problem with communities knowing where landfills are – my concern is that the suitable landfills might change, so if there were a listing, it should be made clear that it is as of a particular date and subject to change. [Mark Gorta]</p> <p>I think that if landfills are going to be listed in the Plan, then we should consult with local community groups first and let them know that the landfill will be listed in the plan. [Paul Bainton]</p>	<p>Because the accredited landfills are subject to change over time and a listing of these landfills would be likely to become outdated, it was felt that it would be of limited value to include it in the OCP Plan. However, Section 9.4 has been added to indicate that the agency will provide current information on these landfills on request, as it is agreed that this information needs to be readily available.</p>
<p>9.3 It is unlikely that much of this material would go to landfill – material containing OCPs at a concentration <50 mg/kg is more likely to be contaminated land and outside the scope of the plan. [Mark Gorta]</p>	<p>Agreed.</p>
<p>9.3 Are all landfills licensed to receive non-scheduled OCP waste run by agencies rather than private facilities? [Peter Wong]</p>	<p>Agencies do not usually run landfills but they will be the responsible regulatory authorities for any landfill able to receive non-scheduled OCP waste.</p>
<p>9.3 Is the threshold quantity for landfill 50g? [Wayne Thompson]</p>	<p>The landfill criterion is set by concentration, not quantity.</p>

Community Comments	OCP Consultation Panel Responses
9.3 Brisbane City Council has set landfill limit at 25 ppm, while the OCP Plan sets it at 50 mg/kg. [Leon Huinck]	Any landfilling of non-scheduled OCP waste will need to be to landfills which meet the requirements of Appendix B to the OCP Plan. Jurisdictions may set standards more stringent than those in the Plan if they wish.
9.3 What is the half life of OCPs in a landfill situation? [John Armbruster]	OCPs will bioremediate slowly if bacteria are present; however, in sterile landfill they will not biodegrade.
9.3 Why is it that only 4 or 5 specific landfills will accept this waste? [John Ready]	There are very few landfills in Australia that are built and managed to the standards required to receive non-scheduled OCP waste.
9.3 In Queensland, scheduled OCP waste is landfilled at Gurulmundi after treatment. [David Miles] Treatment for filling into Gurulmundi is encapsulation. Is this an appropriate 'destruction' procedure? [Trevor Lloyd]	Noted. However, Queensland Department of Environment has since indicated that this is no longer taking place and that no OCPs have gone to Gurulmundi since May 1997. Encapsulation is not destruction. The plan will not permit landfilling of materials that contain more than 50 mg/kg OCPs.
9.3 What is the relationship between Sections 8.6.4 and 9.3 – how do they work together? [Adrian Lewis]	The aim of the whole process is to destroy OCPs – dilution to facilitate landfilling is prohibited.
9.3 How will non-scheduled liquid waste be handled? [Scott Blacklow]	There is not likely to be much of this material, but it could be disposed of in approved high temperature boilers.
9.3 I strongly oppose landfill disposal of any OCPs. [Michael Hogan]	Opinion noted.

Section 10: OCP monitoring

Community Comments	OCP Consultation Panel Responses
10 WA free range eggs are tested for residues prior to sale. [Sandy Lyons] We have done analyses on fruit and vegies; Department of Agriculture has done them on cattle. Some large stores won't accept free range eggs from a supplier until they have been checked for OCPs. [Geoff Harcombe]	Noted – this may provide useful data.
10 What is the point of the monitoring given the enormous costs? [Farran Dixon]	Enormous cost is not intended or expected because the intention is to consolidate data from existing monitoring programs. Evidence of decreasing OCP levels would boost confidence in Australian produce.
10 Monitoring program could be a useful project but comparative work is essential – otherwise the conclusions would be meaningless. In any case, the costs would be enormous. [Peter Rutherford]	If existing programs do not produce readily comparable results, the capacity to change methods to allow better/easier comparisons should be examined.
10 Monitoring is useful to validate theories that OCPs affect community health. [Chris Phillips]	There is some interest in this.

Community Comments	OCP Consultation Panel Responses
<p>10 The last WA study on OCPs in human tissue and breast milk was in 1991. [Unidentified, Merredin workshop]</p>	<p>Information noted.</p>
<p>10 WA WorkCover licensing agreement requires ag/vet chemical operators to have blood testing each year and if found to have high levels of listed pesticides, then they must cease work for a little time. [Unidentified, Merredin workshop]</p>	<p>Noted.</p>
<p>10 I question the rationale for the extent of OCP monitoring – why blood, fertiliser, etc? What if levels are not coming down, what are we going to do about it? Wording should be changed to state ‘existing monitoring data will be collected and examined’ [Peter DiMarco]</p>	<p>The aim was to get indicative but not comprehensive data. Agreed – this section (now 11) has been reworded along these lines.</p>
<p>10 Focus money on getting the OCP problem solved, ie. collect, store and destroy, then start OCP monitoring program. [Peter Wahlsten]</p>	<p>It is envisaged that a significant proportion of the money will be spent on collecting and destroying the waste, not on the monitoring effort.</p>
<p>10 This seems to be reinventing the wheel because there are existing monitoring programs eg. Market Basket Survey, National Residue Survey. [Iain Chalmers]</p> <p>If the level of OCPs has reached its pinnacle and is presumably dropping as they are no longer generally available, and given the cost of residue surveys, blood sampling etc, is this really going to be worth the money? [Geoff Sullivan]</p> <p>This program is about what has been used (the past); monitoring is about use (present and future). Why do monitoring? I am glad that you are not intending to do large scale surveys. I suggest you add dot points to indicate that you intend to use the data from current surveys (identify the actual surveys) – this would make me feel easier that we are not up for big dollars for monitoring. The priority is collection and destruction, monitoring is of minor importance in this plan. [Bernard Milford]</p>	<p>Section 10 envisages that monitoring will focus mainly on existing information and better collation of that information, and gap filling, if necessary. For instance, not all commodities are included in the National Residue Survey.</p> <p>We’re more interested in gathering existing data together and using it better than we do now, than in undertaking new surveys. (New surveys may be required to identify and fill gaps or to respond to crises, though.)</p>
<p>10 National Residue Survey has a series of graphs which shows steadily falling levels of OCPs since the 1970s. [Philippa Rowland]</p>	<p>Noted.</p>

Community Comments	OCP Consultation Panel Responses
<p>10 Draw on existing and incoming data, eg National Market Basket Survey. [Leo Heiskanen]</p> <p>Does Market Basket Survey cover OCPs? This type of survey builds confidence for farmers in no-residue primary produce. [Peter Valentine]</p> <p>There are quite a range of programs being run by government departments, eg Market Basket Survey, National Residue Survey, so there is probably more available than what people are seeing – it is a matter of collating and accessing the data from these programs. [John Alcock]</p>	<p>This will be done.</p>
<p>10 What is the point of human toxicological studies when chemicals are banned? [Peter DiMarco]</p>	<p>The intention is to keep the literature on this subject under review rather than do original research as part of the plan.</p>
<p>10 What about OCPs in soil? [John Andre]</p>	<p>The Plan is not intended to cover contaminated soil (see Section 2.4).</p>
<p>10 Residues in dried fruit and wine grapes have been monitored. [Alex Sas]</p>	<p>Noted – for consideration in monitoring program.</p>
<p>10 The nature of the survey data will need to be explained to the public. [Trevor Ranford]</p>	<p>Agreed.</p>
<p>10 I am concerned that there may be a lack of recent data on chemical collections in SA. [David Walker]</p>	<p>Noted.</p>
<p>10 A lot of farms were quarantined in the late 1980s. You should look at results of continued monitoring of these properties. [Ivan Dainis]</p>	<p>Information on this has been obtained. It indicates that, as of July 1998, four property files were still active (ie these cases had not been satisfactorily concluded) with appropriate orders in place – all of the other properties that had been investigated had been cleared. Surveillance of the State is now dependent on the National Residue Survey testing regime.</p>
<p>10 Is anybody compiling a list of key indicators to trigger potential problems associated with storage, spills etc? If we have a problem with leachate from tips getting into catchments, residents tend to turn to their local council. One of the problems with monitoring is that it isn't meaningful unless indicators are available and communicated. Therefore it is necessary to talk about what can be done meaningfully at a local level and what sorts of things may trigger problems. [Paul May]</p>	<p>Agreed that this is crucial and needs to be considered in the implementation phase.</p>

Community Comments	OCP Consultation Panel Responses
<p>10 Looking at these indicators is highly valuable work, but they don't measure exposure – they measure past usage.</p> <p>The real success of the program will come down to resourcing – while I endorse monitoring being done, a separate bucket of money may be needed for this. [Ian Coleman]</p>	<p>These measures here are not meant to be quality assurance measures of the program, but to confirm whether levels are declining, as would be hoped under the Plan.</p> <p>A staged approach to financing may need to be considered.</p>
<p>10 I suggest monitoring at collection points and consolidation stores to include measuring leakages. [Isabelle Vallin]</p> <p>This will put undue costs on local government. [Phil Hansen]</p>	<p>These matters will be covered in the facility licence or other form of approval.</p> <p>These matters will be dealt with in the negotiation process.</p>
<p>10 The monitoring component is confusing and doesn't align well with the scope of the plan. Performance evaluation of the plan, especially with regard to site management, would be desirable. There is a need to monitor the effectiveness of the plan in collecting OCPs – I don't see anything on this, but maybe this will come later when the plan is in operation. Perhaps there is a need to do better assessment of what is out there. [Norm Blackman]</p>	<p>This section (now 11) has been amended to make its purpose clearer. Section 13.1 deals with annual public reports on progress.</p>
<p>10 For monitoring OCPs in the broader environment, baseline data is needed for the components identified, eg sewage outfalls, landfills – you need to know what's in the environment now, in order to monitor changes in concentrations. [Peter Waterman]</p> <p>We need to have some measures by which to judge whether the management plan is a success or not – measure against our expectations – we need some measure of what's out there. [Michael Nicholls]</p>	<p>Agreed.</p> <p>Agreed, but limited data make this task difficult.</p>
<p>10 How should existing and past landfills be dealt with – is there a 'time bomb' in them? – How long before stuff leaches out and where will it go? [Peter Waterman]</p>	<p>There does not appear to be evidence to suggest that OCPs in landfills are a major environmental problem, but monitoring results are limited.</p>
<p>10 Has any consideration been given to following what NZ has already done? (Have an ongoing 3 year program, with local destruction about to begin). [Stuart Glen]</p>	<p>We have fairly close contact with the NZ program and are following this program with interest.</p>
<p>10 There is a need to monitor sewage sludge. [Percival Thomas]</p>	<p>Agreed – there are data available on this.</p>
<p>10 Have there been discussions with Health Departments over the first dot point? This raises a whole lot of complex issues in relation to sampling – I feel it may be too prescriptive. [Gratton Wilson]</p>	<p>This section (11 in the finalised OCP Plan) has been rewritten to place the emphasis on existing programs.</p>

Community Comments	OCP Consultation Panel Responses
10 We get quite a lot of documents through the Work Health Authority, but the public does not have much access to them. For example, they contain much sampling data on breast milk – how do you get that more widely spread? [Sue Nixon]	This section (now 11) has been redrafted and it is intended that access be improved to existing data.
10 I suggest using websites, which are being more and more widely used (web presentation rather than web search). [Sue Nixon]	Good idea. For consideration in communication strategy.
10 Testing cattle that have been slaughtered and dairy produce – could you tap into these, rather than do new testing. [John Armbruster]	Yes, this will be a useful source of information.
10 Queensland DPI records – have been running for 13 years, and you can ask for these. [John Armbruster]	Noted.
10 Determine what has been destroyed and compare with the estimate of what has been out there to find out how much is still left. I can see high cost attached to this, especially government funding. There is a need to know how long and when to stop collection. [Rod Curtis]	In practice, this cannot be done as we don't know what quantities of OCPs have been purchased and used in Australia.
10 I am surprised that you do not know how much collection will cost, based on previous collections. There is a need to incorporate all unwanted chemicals, as OCPs is only one problem. Something is going to come up in future and we will continue to have something new from time to time. [John Ready]	The cost of a collection program will depend upon its scope and the scale of in-kind resourcing, and could therefore vary considerably.
10 State of the Environment are developing indicators for chemicals in sectors of the environment which could be relevant to Section 10. [Adrian Lewis and Stephen Waight]	There is a cross reference between State of the Environment reporting and Section 11 in Section 13.2.1.
10 I am concerned that mushroom compost could contain hazardous residues and similarly for other products such as woodchips. Residues could leach into the garden and be taken up by garden produce. [Jean Wilby]	If monitoring results are available they should be incorporated.
10 What capacity exists for OCP analysis in Tasmania? [David Baker]	A number of laboratories are able to do these analyses but none are NATA accredited at present.
10 What does “nationally coordinated” really mean? [Pat Deprez]	This section (now 11) has been changed and no longer uses this term.
10 A breast milk study was conducted in Victoria. [Allan Bonollo]	We have this information.
10 Past monitoring data is a good tool for motivating action. [Bob Handby]	Agreed – but only if it shows we still have a problem.
10 Breast milk study shows decrease in OCPs and care should be taken not to alarm the community unnecessarily. [Jean Meaklim]	Agreed that care needs to be taken in communicating monitoring results.

Community Comments	OCP Consultation Panel Responses
<p>10 3000 cattle were sampled for the National Residue Survey with 2 showing levels above MRL and a few others with trace amounts. Nevertheless, isolated incidences can have a profound effect on trade and these ‘disasters’ could be eliminated by the OCP collection program.</p> <p>Monitoring is supported but interpretation is critical to ensure the data is used appropriately and not to alarm the community.</p> <p>Broad acre issues are being handled well in Victoria and there is a good understanding of where the problem farms are. [Tony Britt]</p>	<p>Agree that focus should be given to removing the causes of potential contamination.</p>
<p>10 Must collect as many chemicals as possible in the program because the real danger is too much monitoring and not enough collecting. There is no mention of specific meat monitoring in the review section. [Ian Manley]</p>	<p>This is covered under the National Residue Survey, the results of which will be utilised under the Plan.</p>
<p>10 Water authorities also do some monitoring. [Jim Stranger]</p>	<p>Noted.</p>
<p>10 There is considerable anecdotal evidence that people are using Mirex on mangoes (which is illegal) – is there any thought of monitoring mangoes? [Philip McMahan]</p> <p>Routine testing is done of mangoes. Neither OCPs nor Mirex are used any more. However, residue testing is not adequate. I am unaware of any recent OCP use in the mango industry. Mirex is an issue, but in certain cases, doesn’t do the job anyway. [Ian Baker]</p> <p>How do you know OCPs are not used? [Sue Nixon]</p> <p>Can’t know for certain, but travel around farms and don’t see any being used. More than happy to support residue testing. [Ian Baker]</p> <p>I gather that a lot of fruit and vegetables are tested for residues – don’t know how much is done on mangoes, but think this is the best approach. [Gerry Wood]</p>	<p>Exchange of information and views noted. We understand that the National Residue Survey does not monitor residues in mangoes, but that the NT Department of Primary Industry and Fisheries provides funding to the industry for an annual mango quality monitoring program.</p>

Community Comments	OCP Consultation Panel Responses
10 Among the conditions applying to the last extension given for OCP use in NT a couple of years ago was that the NT Government was to do some monitoring – this hasn't been done. I would encourage the retention of specific monitoring in the plan. [Jayne Weepers]	We understand that the strategy proposed by the NT in 1995 for the continued use of organochlorines included undertaking soil and residue testing to detect the presence of organochlorines. If that has not happened, we consider that a matter for regret. The OCP Plan (Section 11) provides for a program of identification, collation and analysis of existing monitoring data for OCPs in a variety of media.
10 There are no freedom of information provisions in the NT. [Jayne Weepers/Philip McMahon]	Noted.
10 A salient point is that OCs are generally not water soluble, so analysis of organisms is more relevant than of water. [Philip McMahon]	Agreed.
10 For export products, it is easiest for the Commonwealth Government to step in at that level. [Robyn Dyll]	Noted.
10 The mango industry does have a quality assurance program. [Gerry Wood/John Alcock]	Quality assurance programs are being built in and are useful mechanisms to ensure compliance with market expectations.

Section 11: Certification

Community Comments	OCP Consultation Panel Responses
11 If there is not a facility in SA and the waste is transported interstate, how do we know if the material has been destroyed? [Alec Smith]	Destruction certificates are provided for each consignment. The SA EPA has confirmed that this system is working.
11 Will a farmer receive certification for waste brought in for destruction? This traceability is important for QA programs to be able to advise agencies such as AQIS and DPI that OCPs have been handed in to an authority. [Trevor Ranford]	Not the intention, but there may be merits in such a scheme. Some holders, however, will not wish to be identified as having OCPs. Provision of a certificate to those holders wishing one could be considered.
11 The QA requires that unwanted chemicals which are disposed are recorded. [John Andre]	This is a feature of accreditation schemes such as Cattlecare.
11 The problem with self-certification is that there is no independent auditing. [Geoff Sullivan]	We would expect any regulatory agency to do spot checking. NSW EPA confirmed that this was part of their role, but noted that it would not be checking every single one.
11 What level of surety does the community want – will they accept the level of surety? [Unidentified, Dubbo]	Present facilities have been operating without great community concern.
11 Ownership changes to the destroyer. [John Hasted]	The question of ownership/ownership changes for OCP waste along the process of collection and destruction is not simple and has yet to be resolved.
11 Ownership is going to be a stumbling block for local government; they will not take/collect it if they own it. [John Hasted]	Agreed – ensuring that this is the case will be a prerequisite for local government involvement in the collection program.

Community Comments	OCP Consultation Panel Responses
11 We need Federal Government to take responsibility and ownership of the waste. [Ray Macnamara]	This may be the way to deal with the problem, but considerable negotiation remains to be done between all spheres of government and stakeholders before these matters are resolved.
11 At a hazardous waste conference in 1994, Queensland guaranteed that legislation would be in place by the following January for transport certificate of inter and intra State movement. [Miles Blake]	The National Environment Protection Measure for the Movement of Controlled Waste may resolve this problem.
11 Certification and destruction facilities, does this apply to contaminated soil? [Philippa Curran]	No. This management plan does not deal with contaminated soil.
11 Will community right-to-know principles be incorporated into legislation? How will the provisions of the Plan be incorporated into legislation and regulation consistently across Australia? [Bob Handby]	Section 2.8 states that the provisions of the OCP Plan shall be given effect through Commonwealth policy and relevant State and Territory instruments. Sections 5.8, 6.3, 9.4, 10.3, 11, 12.1 and 13.2.2 of the OCP Plan contain important community right-to-know principles which should be reflected in those instruments.
11 What has been done about paper trail by companies? [Nigel Green]	A paper trail only exists for chemicals currently in use, but not for most Schedule X OCPs because they are no longer registered for use.
11.1 Waste tracking regulations are expected soon in Queensland; transporter and vehicles will have to be licensed. [Dagogo Ibiebele]	Noted.
11.1 In relation to the requirement for the agency to record waste movement, how do we find out what happens if the waste is shipped to another State? We need a national register for this. Craig Darlington]	The agency in each State will be required to keep track of waste movements within each State. Transfer of waste beyond borders will require State-to-State arrangements in tracking.
11.1 Interstate tracking system works well. [Jim Straker]	Opinion noted
11.1 Is there any way of tracking movement of containers from the manufacturer to supplier and user. [Sarah Moles]	OCPs are no longer produced in Australia or imported. Industry indicates that it is not feasible to track past movements of containers.
11.1 What is happening with the implementation of a waste tracking system in Queensland? [Jamie Cupples]	The Queensland Department of Environment reports that there is no intention to introduce their waste transport tracking system until their Environment Protection Policy has been finalised.

Section 12: Community participation, education and training

Community Comments	OCP Consultation Panel Responses
12 We should make people aware of what is and what is not a major hazard facility. This could overcome unnecessary concern from members of the community during a collection program. [Elaine Attwood]	Agreed – this should be done during the implementation program.

Community Comments	OCP Consultation Panel Responses
<p>12 Would existing OCP waste destruction facilities be capable of handling additional chemicals collected during the collection program? [Barbara Murrum]</p>	<p>In some cases. Other treatment technologies are available for most non-OCP materials.</p>
<p>12 Where are the three existing facilities? [Tim Marshall]</p>	<p>Kwinana, WA (EcoLogic), Darra, Queensland (BCD Technologies) and Dandenong, Victoria (Technosafe).</p>
<p>12 I have a concern about date-expired chemicals and what to do with those. These are unwanted chemicals along with OCPs. [David Jesse]</p>	<p>The NCSDS is being developed for this.</p>
<p>12 Cattlecare, Flockcare, etc have the aim of ensuring residue levels are met. We will need an ongoing information program running to saturation at least two months prior to any collections, with heavy emphasis on the media. [Bob Barwell]</p> <p>People take more interest in issues which affect them directly, eg NT termiticides – there is a very high level of understanding among those affected, but not others. You need to make sure you target the right media, public relations groups etc and at the right time, otherwise it will be a waste of money.</p> <p>You need to have a well-informed spokesperson who is able to provide consistent information and sensible answers to questions likely to be asked – there are many issues involved. [Roger Toffolon]</p>	<p>A communication strategy will need to be carefully planned.</p>
<p>12 We had PCBs stored at our facility, quite legally, then went on a local talkback show – this got people fired up, and we copped a week or so of flak. We invited the media out to look at our facility – after this, people thought it was great – a week or so after, the local talkback host came out with his boss – we received a favourable report on the radio, then there was no more interest in matter. [Ivan Diggs]</p>	<p>As this favourable outcome demonstrates, openness is an essential part of any collection and storage scheme.</p>
<p>12 With the gun buy-back scheme, the regular gun buy-back scheme had limited success, while the mobile unit that came into town was much more successful – I think people are reluctant to go to a police station – it may be similar with taking stuff to a collection point. [Philip Palmer]</p>	<p>It is important to be aware that collection points need to be selected with care so as not to discourage people from bringing material forward.</p>
<p>12 You need peer group pressure – own people doing the job – CWA, Cattlecare, NFF – those sorts of bodies get down to the local level, get away from concept of authority telling people what to do, and are most likely to get information out individually. [Paul Handsaker]</p>	<p>Agreed that this is an effective way of operating at the local level.</p>

Community Comments	OCP Consultation Panel Responses
12 Send information out with rate notices – Rural Lands Protection Boards also send out rates notices. [John Howarth]	This mechanism should be considered.
12 Schools – children are another good means of passing on educational-type information. [Pam Moore]	Agreed – the Kondinin Group school campaign could be used as an example.
12 Peter Sandman postulates risk as hazard plus outrage – there is a need to encourage outrage in the community to a degree where they want to bring materials forward. [Geoff Sullivan]	Noted. Consideration will need to be given to ways of raising community concern to an effective level, leading to action.
12.1 I have found Eco Logic very open with information about what they are doing. [Steve Fitzpatrick]	Noted.

Community Comments	OCP Consultation Panel Responses
<p>12.2 Suggested mechanisms for spreading the message include:</p> <p>Farmcare [John Kent] Internet [John Kent] rural media [John Kent] environmental networks eg Clean Up Australia [Isabelle Vallin] Farmers Federations Rural Lands Protection Boards [Michael Nicholls] Cattlecare [Norm Blackman; John Alcock] Flockcare/Dairy First [Norm Blackman] school children [Steve Clay] catchment/stream management groups [Peter Waterman] pest controllers – both rural and urban [Robyn Holden] noxious weeds officers [Phil Hansen] Cooperative Research Centres [John Kent] continuing education centres, adult education [Percival Thomas] nurseries [Peter Waterman] landfill signage to advertise when the campaign is going to start [Peter Wong] ‘Shedcare’ [Sue Nixon] John Laws [Louise Fuller] Ian McNamara (‘Macca’) [Robyn Dyall] Don Burke ABC TV gardening program ABC Radio – Country Hour, Territory Radio Alice Springs [Gerry Woods] TEABBA (Top End Aboriginal Bush Broadcasting Association) [Carol Carttling] End clearance sales [Gerry Wood] NT Horticultural Association – very multicultural group, so has good access to non-English speaking growers – puts out pamphlets etc which are also accessible to the general public [Sue Nixon] Meat Research Corp [Jayne Weepers] Greening Australia [Nigel Green] Caring for Country (Landcare program) [Gerry Woods] Environment Training Company – Australia-wide training [Louise Fuller] doctors’ surgeries [Robyn Cahill] Load Restraint Guide [Ian Philip] NT Rural College [Philip McMahan] DPIE Property Management [Jayne Weepers] NT Transport Association fact sheet supplied to union members [Rob Fischer] CWA members’ magazine [Irene Gracie] DPI Agnotes [Philip McMahan] Northern Territory University Farmcare safety manual [Alison Scott] Menzies School of Health and Research</p>	<p>Suggestions noted. All good ideas for consideration for incorporation into the implementation program.</p>

Community Comments	OCP Consultation Panel Responses
<p>12.2 It will be relatively easy to get messages across to a progressive audience using the networks suggested here, but there is going to be real difficulty getting to the rest of the audience, many of whom may be illiterate. This needs to be looked at – specialist advice may be needed. [Michael Nicholls]</p>	Noted.
<p>12.2 You haven't looked at networking with towns people – may be able to draw on service clubs, for example, for assistance. [Peter Beer]</p>	The Panel agrees that communication with people in regional centres is essential.
<p>12.2 It is important to get to people from non-English speaking backgrounds – should focus on getting through their internal structures eg church groups. I have a copy of a report on getting health messages to people from a non-English speaking background. [Gratton Wilson]</p>	Good suggestion for follow up in the implementation phase. We have obtained an extract of this report, a protocol for consulting with and providing information for non-English speaking background communities.
<p>12.2 National competency standards for pest control operators have recently been launched – currently training is provided through TAFE. Pest control operators could provide information to customers. [Robyn Holden]</p>	Noted.
<p>12.2 Cattle Council puts information into retail stores – point of sale information materials provided at rural stores would reach people that the rural press doesn't reach. [David Inall]</p>	Noted.
<p>12.2 Retailers have face-to-face contact over products – could get them to give reminders to farmers. Farmers are very busy and need reminders – the only way is by phone or face-to-face. [Paul Handsaker]</p>	Retailers are the major means of face-to-face contact with farmers and should form a key part of a communication strategy.
<p>12.3 Use schools and children to educate on better chemical use. [Chris Moon]</p> <p>Use children as junior safety inspectors – awareness raising made fun. [Peter Rutherford]</p> <p>I like the idea of community education, spreading the message through schools. [Mary Ormay]</p> <p>Use children at school for publicity to get to non English speaking background people. [Preben Jacobsen]</p>	Good idea – children and schools are a useful information dissemination tool. However, care will be needed with this approach – the use of children in any program needs to be thought out carefully if it goes beyond acting as a conduit of information to other household members.
<p>12.3 The Australian Veterinary Association has put together a Petcare package aimed at Primary School children, which has been very effective in getting the message across about appropriate pet care – this shows school children to be a good means of getting information across. [Norm Blackman]</p>	Noted.

Community Comments	OCP Consultation Panel Responses
12.2 I think some kind of benefit could be provided to farmers who do the right thing – perhaps a competition could be held – this would help to raise awareness. [Mary Ormay]	Noted – for consideration in implementation phase.
12.2 With these wastes, most facilities need a licence and details of these are publicly available (from local or head office) of the agency. [David Miles]	Noted; however, we believe that the provisions of this plan go beyond the publication of the licences.
12.2 People destroying waste may not want to reveal the quantities they are treating because of commercial confidentiality. [Rob Curtis]	This is not likely to be a problem, based upon experience to date. Note also that under Section 10, the agency shall require destruction certificates from destruction facility operators and shall maintain a publicly accessible register of these.
12.2 VFF have surveyed farmers recently to determine how much OCP remains on farms awaiting collection. [Richard Steere]	We have this survey – this is valuable information.
12.2 Given the major groups which are highlighted, it is important to target and involve subgroups because they may have a different and possibly more practical understanding of the problem and solutions. [Richard Steere]	Agreed.
12.2 I suggest on-call personnel who can handle collection issues. [Brigitte Schulz]	The Hunter Water Board, Newcastle and ACT have been brought to our attention as having schemes of this type.
12.2, 12.3 There are two levels of information – general educational information about the process, and more specific information about particular events such as collections – and different means would be appropriate for conveying each type of information. For getting information out to people about collection points, then we should use schools etc over a long period. For telling them that a collection will be taking place, say, next month, then there is a need to get information about in a timely fashion, ie need to tell them there will be a collection in 2 weeks, or next week, not in 3 months time. [Roger Toffolon]	Agreed – publicity will need to take account of this.
12.2, 12.3 Rural Lands Protection Boards would be a key player – invaluable for face-to-face contact with farmers (these are boards of elected producer representatives who sit as a board to cover various aspects of the NSW Rural Lands Protection Act). [Greg Markwick]	Noted.

Community Comments	OCP Consultation Panel Responses
<p>12.2, 12.3 Many Rural Lands Protection Boards would themselves be holding stuff at moment. They have some facilities, some experience in handling chemicals. Some of the larger boards have very good facilities, though smaller ones tend to have less well-developed ones. [Roger Toffolon]</p> <p>No one will bring chemicals into our Board - we won't take them – this is similar to many others. [Philip Palmer]</p>	<p>The extent to which RLPBs have such facilities was questioned by others present – this requires further investigation for possible application in the implementation phase.</p>
<p>12.3 All personnel involved will have to be fully trained and have appropriate protection equipment. They would also need to be aware of dangerous goods, OHS and health regulations. Who will pay for this training? Who is going to instigate contingency planning for spills and accidents? [Colin Daly]</p>	<p>These things will be the responsibility of the agency (EPA or equivalent) in each State and Territory.</p>
<p>12.3 The Local Government Advisory Board has a role in coordinating the resources available at a regional level, ie there is likely to be some expertise in one place, different expertise in another.[Evelyn Brand]</p> <p>Not only local government but also Pasture Protection Boards and Agriculture Departments. [Sandy Lyons]</p>	<p>Many organisations will be able to contribute.</p>
<p>12.3 I am not convinced that chemicals will come in that easily and believe that organisation, community groups and infrastructure are critical. [Neil Dixon]</p>	<p>Agreed.</p>
<p>12.3 Local groups have difficulty in obtaining information about hazardous chemical issues. [Tim Hunter]</p>	<p>This experience is frequently reported in the absence of a coordinated approach to these issues.</p>
<p>12.3 Avcare has a program to encourage people not to transport chemicals inside their passenger vehicles. Information is distributed through CWA, media and rural magazines. Peter Gunn]</p>	<p>Useful networks.</p>
<p>12.3 Information could be sent out with rural merchandising accounts to farmers. [Steve Benzie]</p> <p>I suggest using direct mail to advertise. [Tim Hunter]</p>	<p>Various forms of direct mailing may be used to inform about the program and reasons to relinquish OCPs, and to ask for people to return them. However, experience suggests that direct mailing needs to be supplemented by a range of other activities.</p>
<p>12.3 Use community newspapers. [Bob McMiles]</p>	<p>These are often widely read and a good source of local information.</p>

Community Comments	OCP Consultation Panel Responses
<p>12.3 Agriculture WA, NFF and others could cooperate to conduct information and education sessions with farmers. You need to use well-known locals to talk to farmers (friends). Facilitate calling on each farm household. [Peter Wahlsten]</p>	<p>This is a matter for the implementation phase, and may be appropriate for the Merredin area and some other regions.</p>
<p>12.3 This refers to national focussed material and action whereas there should be an additional Section 12.4 to cover local efforts. [Peter Rutherford]</p>	<p>It is believed that Section 12.3 is sufficiently flexible to cover this point.</p>
<p>12.3 The target for education programs will vary from region to region and in the Adelaide Hills will include hobby farmers and lifestyle residents. [Andrew Nicholls]</p> <p>Chemical resellers should be used for education. [David Walker; John Andre]</p> <p>Local government will also be able to provide significant infrastructure for the distribution of education material. [Brigitte Schulz]</p> <p>Should use CWA to ensure information is getting to the target areas. [Ivan Dainis]</p> <p>Should use stock agents such as Elders and Dalgety to provide and pass on information. [Michelle Brenton]</p>	<p>Suggestions noted – all good ideas for consideration in the implementation program.</p>
<p>12.3 Does the EPA have resources to provide training? [Colin Daly]</p>	<p>EPAs will provide information but probably not training.</p>

Community Comments	OCP Consultation Panel Responses
<p>12.3 Farmcare Australia is a national training program for handling farm chemicals. It is delivered separately in each State, with the training program based on an agreed national curriculum . There is a network of about 400 trained and accredited instructors. The course is run mostly through TAFE, but also through State Agriculture Departments and, in some States, high schools. The main target is farmers, but the program is also intended to be used by local government and water resources managers. Since 1991, about 65,000 have undergone training in use of agricultural and veterinary chemicals out of an estimated potential market of about 400,000. [John Kent]</p> <p>Cattlecare and Flockcare are both to have residue management in their programs and are QA programs. Cattlecare is well under way, while Flockcare is in its final stages of development.</p> <p>The dairy industry has a similar type of program, Dairy First, which includes a residue management program. [Norm Blackman]</p>	<p>These are invaluable national programs which will be integral to both the communications strategy and the implementation process.</p>
<p>12.3 The Internet is becoming an increasingly important means of spreading information – a site is to be launched at the Cattlemen’s Union congress in Toowoomba in August. At the moment, there is a major problem with accessing information that is widely dispersed over many unconnected sites – what is needed is various specific sites that draw together information and present it to various producers. [Norm Blackman]</p>	<p>Noted. The Internet will be a valuable tool for communication, particularly in remote and regional areas.</p>
<p>12.3 In managing residue problems in the meat industry, duplication of efforts was found between States – they are now sharing more and more on a national basis. [Norm Blackman]</p>	<p>Noted.</p>
<p>12.3 I suggest training and using local bushfires board extension officers to go collecting the waste – this would ease the cost, and they would then have those skills permanently. [Peter Wong]</p>	<p>That kind of networking and skilling process, augmenting existing resources, will be very helpful.</p>
<p>12.3 If councils are going to set up collection points, it will be necessary to make sure they have public liability coverage. Council tipmaster/transfer station manager needs to be properly trained. [Peter Wong]</p>	<p>Agreed.</p>

Community Comments	OCP Consultation Panel Responses
<p>12.3 You need to involve local government, CWA and farm organisations; need to start a fair way ahead of when it occurs; it is difficult to get farmers to read things if they don't have time to read. [Ray Macnamara]</p>	<p>Noted.</p>
<p>12.3 Queensland rural women's network is very active. Education for farm safety through women as they deal with washing and children playing. Use existing information organs that are there, eg. Landcare newsletter. [Sarah Moles]</p>	<p>Noted.</p>
<p>12.3 CWAs are not just country based – the majority of members live in regional centres – there is a wide network – if information could be sent to the State President, she could pass it on to group representatives who meet quarterly – they could then pass it on through their networks. Different means will be suitable for different communities. [Pam Moore]</p>	<p>This will be one of the valuable networks for distributing information.</p>
<p>12.3 Use rural radio morning and midday, rural TV at night. [Roy Smith]</p>	<p>Suggestion noted.</p>
<p>12.3 A 90% increase in container returns resulted because we went out to talk to farmer groups. [Wayne Thompson]</p>	<p>Personal contact is very effective.</p>
<p>12.3 Farmers have been on chemical accreditation courses. There is much more awareness in the community than given credit for. Vegetable farmers have a newsletter that goes out to 8000 farmers every fortnight. [Preben Jacobsen]</p>	<p>For consideration in implementation phase.</p>
<p>12.3 There is a need to give specific dates. [Preben Jacobsen] We need to have definite dates, published well in advance. [John Armbruster]</p>	<p>Agreed.</p>
<p>12.3 There needs to be a high concentration of publicity for 6 weeks to 2 months before. [Roy Smith]</p>	<p>Agreed.</p>

Community Comments	OCP Consultation Panel Responses
<p>12.3 There has been a container collection scheme run in Waggamba Shire Council. When they tried to use the fire service as a collection point, it did not work because they brought dirty and full containers which had to be sent back. The successful approach is to go onto each property (consolidate 4-6 farmers' holdings on one farm). Crusher can do 4000 containers a day. The Cotton Foundation is working with them, filling up farm bulk tank. Collection and crushing cost money – \$20,000 to do the initial year, \$9,000 for the second year. This year \$8,000 is being budgeted, and \$5,000 expected to be spent. [Ray Macnamara]</p>	<p>Noted – an excellent example of effective implementation at the local level.</p>
<p>12.3 In the urban environment, use local councils to distribute information through rates notices. [Frank Ondrus]</p>	<p>This is an option for consideration.</p>
<p>12.3 You have not mentioned unions; they have regular contact with members through newsletters, OH&S, etc. [Craig Darlington]</p>	<p>Involving the unions will be essential to this program.</p>
<p>12.3 Collection, storage and destruction is important – is going to put cost on local government. I would like to see a cradle-to-grave statement in the management plan. I believe the chemical industry needs to bear some responsibility, and pay. [Craig Darlington]</p>	<p>This will be dealt with through negotiations as per Section 2.7.1.</p>
<p>12.3 I agree that the community needs to be recognised and involved in the process. [Greg Stewart]</p>	<p>Yes, this is recognised under Section 3.3.</p>
<p>12.3 There is a need for both community education and professional/industrial education. I am concerned that community education will be overlooked in the competitive tendering process. [Cath Stephensen]</p>	<p>Yes, this is recognised under Section 3.3. It is important that the community's role is recognised in any tendering process.</p>
<p>12.3 The Chemsafe program for farmers could be developed with the possibility of up to 75% subsidy for training through the Rural Adjustment Scheme (RAS). [Jamie Cupples]</p>	<p>Good idea.</p>
<p>12.3 The sugar industry has courses on chemical handling for farmers and they also can incorporate a module on OCPs in their training program. [Peter Amiet]</p>	<p>This would be helpful.</p>
<p>12.3 The chemicals that are out there are not new. Consolidation stores have to be subjected to approvals, and this will require trained personnel. [David Miles]</p>	<p>Agreed.</p>
<p>12.3 A householder had a 20L tin of dieldrin. I am concerned that there is no mention of householders in 12.3. [Rob Curtis]</p>	<p>Section 3.1 includes reference to householders and we believe that this, together with section 3.3, will deal with this.</p>

Community Comments	OCP Consultation Panel Responses
12.3 I am concerned that householders can buy chemicals that are as hazardous as those bought by farmers, without training or MSDSs. [Jamie Cupples]	Concern noted – however, this is outside the remit of the scheduled wastes process. Specific examples could be brought to the attention of the National Registration Authority.
12.3 What about work places, eg schools and commercial premises? [Peter Brock]	Section 12.3 says that these programs should be made available to all holders of OCP waste.
12.3 Educate through newspapers and life style type TV programs. [John Ready]	These avenues should be explored.
12.3 Waste transfer stations have personnel on site but they may not be suitably trained for handling hazardous chemicals. [Jon Doole]	Noted that some additional training may be necessary.
12.3 The program should be developed strategically because as soon as farmers become aware of a possible collection they ring Council who may not be ready to conduct a collection program. Regional approaches would be more effective to ensure that different collection programs could be conducted. State coordinated collections would be too difficult to manage. [Bruce Burrow]	The timeliness and regional scope of information are critical issues.
12.3 Do you have any idea about quantities in Aboriginal communities – a different communication strategy will be needed for them. [Jayne Weepers]	Existing Aboriginal community networks will need to be used.
12.3 The Menzies School of Health Research has people who are close to Aboriginal farming communities. [Robyn Cahill (AMA)]	A useful channel for delivering information.
12.3 Greening Australia could be a source of names and addresses of people who might be able to help out. [Nigel Green]	Noted.
12.3 Australian Medical Association (AMA) – Doctors’ surgeries are a good access point for information – there are approximately 190 GPs in NT. A lot of doctors are landholders as well, so there would be no problem getting OCPs onto the AMA agenda as an occupational health and safety issue. [Robyn Cahill]	As many GPs are landholders, this network should be used in the implementation phase.
12.3 The Department of Transport and Works runs programs which give out a lot of information on transporting hazardous materials. In NT, we use the Load Restraint Guide. [Unidentified]	Noted.
12.3 DPI have Agnotes – could produce one on OCPs. [Philip McMahon]	Noted.
12.3 Suggestions so far still miss the over-50s males, who do have quite a lot of drums around the place. [Sue Nixon]	This category of holder will have to be addressed in the communications program.
12.3 NT University provides a safety manual for Farmcare – they run courses at which there are always questions about chemical disposal – about 500 people have been trained in the Farmcare course. [Alison Scott]	A number of organisations are in a position to provide formal education regarding OCPs and should be encouraged to do so.

Community Comments	OCP Consultation Panel Responses
<p>12.3 There are no courses on using Mirex, which is a Schedule 7 poison. [Philip McMahon]</p>	<p>Noted.</p>
<p>12.3 How are you going to judge the effectiveness of the education program? – This is going to be very difficult. While you might have a great training program, with everyone knowing about it, do you measure success by this or by whether people hand in their OCPs? [Alison Scott]</p>	<p>Success will be judged on material coming forward. But we can't have a national benchmark – this will need to be done on a local basis.</p>
<p>12.3 If key people in the areas can be identified, the education programs can be addressed through those people. [Sue Nixon]</p>	<p>Agreed.</p>
<p>12.3 In NT there has not been any workable alternative to OCPs offered to growers. For example, we have lost about 50 mango trees since giving up dieldrin as we're not being given an alternative that works. A workable alternative has to be offered so that people will give up using OCPs – otherwise, they will use them illegally when crop losses start to occur as a result. [Irene Gracie CWA]</p> <p>We have a 'chlordane' mentality and need to get the message to people that OCPs are not the only things to use. What a lot of people don't realise is that if OCPs are detected in their fruit, they won't be able to sell it. [Roger Kelly]</p>	<p>Divergent opinions noted.</p>
<p>12.3 I work for both the pest control and real estate industries and think there is an absolute mindset that OCPs are the only things to use – people believe that there's nothing that will replace them – I get requests for left over chlordane and Heptachlor to use on trees. [Barry Johnson]</p>	<p>Noted.</p>
<p>12.3 CSIRO has a research program on <i>Mastotermes</i> – unfortunately no suitable alternative chemicals have been developed which work on <i>Mastotermes</i>, so people growing mangoes who have termites do have problems. But there are management regimes that can be used – there is lot of information around, and experts out there who can help. [John Alcock]</p>	<p>Noted.</p>
<p>12.3 I have been using chemicals for 20 years – there is much contaminated soil, trees treated with bandages – when laws are brought in requiring people to stop using the soil or telling them to get rid of trees, it won't happen. [Charlie Halloran]</p>	<p>Opinion noted.</p>

Community Comments	OCP Consultation Panel Responses
<p>12.3 I think there needs to be a stronger regulating force within industry – who wants to eat contaminated produce? There needs to be a change of mindset and if people won't buy your mangoes, then you are forced to change – regulation from within industry is the most effective way of achieving this. So boycott mangoes until they're edible. [Jayne Weepers]</p>	<p>That is the way things are going in Australia – quality assurance programs with producers taking responsibility are increasingly important, although regulators still have an important role to play.</p>

Section 13: Review

Community Comments	OCP Consultation Panel Responses
<p>13 Is there community input into how the plan is being implemented – can the NAB oversee this? [Chris Phillips]</p>	<p>While the NAB exists then implementation review is maintained. ANZECC has decided on an ongoing but limited role for the NAB beyond June 1998.</p>
<p>13 I understand that facilities for disposal are fairly well stretched at present – there is still a long waiting time for PCBs in Dubbo – there is a need to make sure that storage facilities are of very high standards. [John Davis]</p>	<p>Treatment capacity is expanding a little – the BCD plant in Brisbane has installed Plascon treatment facilities, EcoLogic is in the process of debottlenecking and other processes are coming on stream. The main impediment to increasing treatment capacity is that the volumes of material are limited, so treatment firms are wary about over-investing in treatment facilities.</p>
<p>13 There is a need for publicity on the costs and benefits of this program. [John Hasted]</p>	<p>Agreed.</p>
<p>13 What is the ratio of urban to rural OCPs stored on farms and in households? [David Baker]</p>	<p>There is no accurate understanding of these figures. It has been decided that it is more efficient and cost-effective to proceed on the limited information available.</p>
<p>13.1 There needs to be consistency in annual reports, you need to set guidelines for each State to report to. There needs to be an annual national report compiled by the NAB or some similar body. You need involvement of Agriculture and Resource Department who will have the best information. [Craig Darlington]</p>	<p>Agreed that consistency is needed, although based upon ANZECC decisions, the NAB is unlikely to be in a position to compile a national report.</p>
<p>13.1 Lead agency is a very important point and we need all agencies to work together effectively. [Jamie Cupples]</p>	<p>Agreed – cooperation between all parties involved will be essential.</p>
<p>13.1 Who checks that the agency is sticking to the timeline? How do you make it happen? [Jayne Weepers]</p>	<p>Section 13.1 requires annual public reporting by the agency on progress on implementation of the plan. ANZECC has decided that the NAB should continue to be convened annually for several years to oversight implementation.</p>
<p>13.2 Different bodies should be responsible for different components of review from collection to destruction. What is the agency's responsibility for review? [Ivan Dainis]</p>	<p>ANZECC will determine the nature, process and timing for the conduct of the review, including agency responsibility, closer to the time when it is due.</p>

Community Comments	OCP Consultation Panel Responses
13.2 As State EPAs will be implementing the plan, it will be important to have an independent body reporting on monitoring. [Isabelle Vallin]	Agreed – Section 13.2 has been amended accordingly.
13.2.1 What does the plan mean by environmental toxicology? [Brigitte Schulz]	This refers to new information about toxic effects on plants and animals which might come to hand which could then be distributed to stakeholders.
13.2.1 In relation to the 5th dot point (human health and environmental toxicology of OCPs), are you saying let's look at what's come out of the last 15 years, or are you wanting a new review of health? [Roger Toffolon]	If significant new aspects come up, then a new review would be appropriate.

Appendix A: OCPs on ANZECC's Schedule X

Community Comments	OCP Consultation Panel Responses
How many of the OCPs listed on Schedule X do you believe are still around? (DDT, Dieldrin, Lindane have been off the market for quite some time.) [Gerry Wood]	Information provided during this public involvement program and the results of ongoing collection programs demonstrates that significant quantities of banned OCPs are still in existence.
Quintozene (pentachloronitrobenzene) is still registered – used as a cotton seed treatment – how does this sit with the plan? [Leon Huinck] Lindane is still registered for use with pineapples. [Preben Jacobsen] Lindane is still used by the pineapple industry. There is none in Australia at present, though a company has applied to bring some in but is awaiting government approval. I think that the industry would not be greatly upset if the permit for Lindane was withdrawn, but a couple of growers might be. [Jamie Cupples]	We wrote to the National Registration Authority for Agricultural and Veterinary Chemicals (NRA) drawing attention to the potential for conflict between NRA registration processes and those of the OCP Plan, and seeking advice as to the future registration status of these chemicals. The NRA responded that products containing these chemicals had important uses and that, while they were persistent in the environment, it was not aware of specific concerns that might necessitate their withdrawal under the Ag/vet Code.
Are all Schedule X OCPs banned in Tasmania? [David Baker]	All except Quintozenne – the status of which has been referred to the National Registration Authority.
Why is 2,4,5-T not listed as an organochlorine pesticide? [Jean Meaklim]	It now is – footnote 18 has been amended.
I submitted a list of chemicals which I believe should be included in Schedule X. [Michael Hogan]	The process for adding substances to Schedule X is outlined in Scheduled Wastes Fact Sheet No. 3: <i>Scheduled X Wastes</i> , available from the Waste Management Secretariat.

Appendix B: Segregation requirements for scheduled OCP waste

Community Comments	OCP Consultation Panel Responses
Nil comments.	

Appendix C: Guidance note for the disposal of non-scheduled solid OCP waste

Community Comments	OCP Consultation Panel Responses
Regulatory licensing for particular landfills has been left out. [John Davis]	This is covered under approval by the agency.

Community Comments	OCP Consultation Panel Responses
Some landfills can accept low contaminated soils so the availability of these should be noted in the Plan. [Uldis Neilands]	A decision was taken not to include a listing of approved landfills in the OCP Plan as the status of a number of these was likely to change in the near future. A new section 9.4 has been added to indicate that, on request, the agency shall provide information on landfills licensed to received non-scheduled solid OCP waste.

Appendix D: Extract from the National Protocol for the Approval/Licensing of Commercial-scale Facilities for the Treatment of Schedule X Wastes (July 1994)

Community Comments	OCP Consultation Panel Responses
Nil comments.	

Comments relating to the Discussion Paper on Collection and Destruction of Unwanted Farm and Household Chemicals

General

Community Comments	OCP Consultation Panel Responses
Nil comments.	

Section 1: Setting the scene

Community Comments	OCP Consultation Panel Responses
What message are we trying to convey to the group so that they can go to their constituents to provide advice? [Unidentified]	There is potential danger to health, trade and environment in continuous storage of OCPs.

Section 2: Scope of the unwanted chemicals issue

Community Comments	OCP Consultation Panel Responses
2 Collections will pick up a lot more than OCPs. [Farran Dixon]	This is recognised, but the focus will be more on OCPs than all unwanted chemicals.
2 What about import of hazardous waste because Tasmania receives waste from Antarctica? [Bruce Davis]	This needs to be considered under the scope of the NCSDS.
2 'Unwanted' is a very broad term which could mean that all types of chemicals are collected. [David Parsley]	Agreed.
2 How will the OCP Plan and NCSDS be coordinated? [David Baker]	The programs are being developed jointly – there is considerable overlap in membership between the SWMG and the NCSDS Steering Committee (and both are chaired by Professor Ian Rae).
2 No to Option 1, Option 2 is not practical and Option 4 is too expensive. I prefer Option 3 – with collection points on a temporary basis. Chemicals should be restricted to unregistered pesticides and particularly Schedule X OCPs. [Murray Tankard]	Opinion noted.
2.4.3 The Queensland Government will not fund the ongoing collection of non-OCP waste. The infrastructure of an ongoing collection will be different from that required for a one-off collection. [David Miles]	Noted.
2.4.3 I come from a 10,000 person shire. I want the resellers to take back their products. I find it extraordinary that others have not come with the same opinion. The shire would want to promote any resellers for their public spirited actions. [Jeremy Jenkins]	It is recognised that less populated shires may need particular assistance to carry out collection programs.
2.4.3 There is a need to change the attitude of resellers – responsibility from cradle to grave. [John Ready]	Opinion noted.

Section 3: Some coordination options for making it happen

Community Comments	OCP Consultation Panel Responses
Nil comments.	

Section 4: Operational aspects of managing unwanted farm and household chemicals

Community Comments	OCP Consultation Panel Responses
<p>4 Why are they called ‘unwanted’? Some people may want to continue using chemicals.</p> <p>Is there legislation in place to prevent use, and holding. [Unidentified, Merredin workshop]</p>	<p>We recognise that some people may wish to continue to use de-registered pesticides, but this is illegal. However, if people ‘want’ chemicals, they are unlikely to offer them for collection.</p> <p>Yes, the Commonwealth Agricultural and Veterinary Chemicals Code Act 1994 for registration and restricted permits, and State Agricultural and Veterinary Chemicals or Pesticides Acts for control of use provisions.</p>
<p>4 The essence of a collection program is whether we want a chemical cleansing process on a regular basis. [Ivan Dainis]</p>	<p>This is an important reason for examining the development of an NCSDS.</p>
<p>4 A regional recycling strategy has now been endorsed for the Fleurieu region. Part of the plan includes hazardous chemicals but there is a concern based on other experiences about what is to be done with what is collected. Hazardous materials will need very close management – where are the resources? [Edward Nixon]</p>	<p>Funding for eventual destruction is likely to be the biggest issue. There will probably be local (often in kind) contributions to earlier stages of the program.</p>
<p>4 In relation to all chemicals, farmers are becoming more aware of hazardous materials management and a collection program would complement current QA work. [John Andre]</p>	<p>Agreed. There could be useful synergy.</p>
<p>4 The problem is the unknown chemicals which remain on farms or in households. [David Jesse]</p>	<p>This matter will need to be addressed through the education program – people should be encouraged to hand in any chemicals that may be OCPs.</p>
<p>4 There are other holders apart from farms and households. This should be considered in the Collection Program. Quantities from small businesses will need to be considered. [Andrew Thiele]</p>	<p>The position of holdings by small business remains to be clarified.</p>
<p>4 Promoting innovative container management is essential during the development of the chemical collection program. [Trevor Teakle]</p>	<p>The two programs are related and might be integrated.</p>
<p>4 The program’s description is important to convey the right message, eg. a campaign better conveys its ongoing nature. [Ross Britton]</p>	<p>For consideration.</p>
<p>4 Innovative identification techniques could be used to save money in identifying unwanted chemicals. [Ivan Dainis]</p>	<p>Details were discussed with Dr Dainis and will be taken up by the NCSDS Steering Committee.</p>
<p>4 Could ‘limited’ mean once a year, which is between Option 3 and 4, perhaps coinciding with Clean Up Australia Day? [Adrian Lewis]</p>	<p>This is a possibility.</p>

Community Comments	OCP Consultation Panel Responses
<p>4 The ability to keep collecting residual chemicals is very important. [Jon Doole]</p> <p>I support this strongly because other chemicals are becoming deregistered and unwanted from time to time and need a disposal route. [Jock Barclay]</p> <p>I support Option 4 but the quantities of chemicals requiring collection will reduce over time making waste industry involvement in the process unviable. Strong support for future management of chemicals to enhance international clean agriculture claims. After a specific period of time, when chemical holders have been given sufficient time to surrender chemicals, they should then pay for collection. [Wesley Hazell]</p>	Opinions noted.
<p>4 Ongoing follow-ups could utilise the infrastructure established for the major collection program. [Adrian Lewis]</p>	Agreed.
<p>4 There will need to be clear guidelines for the management of all unwanted chemicals. [David Baker]</p>	This will depend on the final scope of the collections program.
<p>4 Identification of a range of chemicals could be very expensive. [Jon Doole]</p>	Agreed.
<p>4 Will all chemicals be sent from collection points to consolidation stores? [David Baker]</p>	Probably only OCPs and unidentified chemicals would be sent to consolidation stores.
<p>4 Use the information program to make clear the chemicals which are being targeted for collection. [Murray Tankard]</p>	Agreed.
<p>4.2 There should be a subsidy for the return of chemicals. [Paul Davies]</p> <p>I suggest using a process similar to the gun buy-back strategy and amnesty for chemicals, i.e. using incentives. [Bob McMiles]</p>	For consideration in the negotiation process under Section 2.7.1. Given the cost of collection and destruction of OCPs, the possibility of further funds being allocated for buy-backs seems unlikely.
<p>4.2 A judgment needs to be made on what can be handled and what cannot. Waste streams need to be assessed for their most appropriate management. [Tim Hunter]</p>	Noted.
<p>4.2 What's the conclusion in SA where it's ongoing? [Philip Palmer]</p>	It is operating on a monthly basis at Dry Creek – the general opinion was that it was inconvenient for most holders – too far, too infrequent.
<p>4.2 The term “national” needs to be defined – does it refer to a nationally coordinated scheme, or a national policy? [Peter Waterman]</p>	A national policy.
<p>4.2 Have a one-off collection – need licence, storage permission, etc. It needs good advertising to be effective. [Wayne Thompson]</p>	Noted.

Community Comments	OCP Consultation Panel Responses
4.2 Many people only go to town once or twice a month; remote areas may not make it to town for collection. Many people can not afford to get to town too often. [Sarah Moles]	For more remote areas, longer collection periods and a variety of collection processes may be needed.
4.2 I am in support of Option 4 as a comprehensive scheme is needed. Not all OCPs will be captured in the first run. Take the opportunity to collect all types of unwanted chemicals at the same time. [Frank Ondrus]	Opinion noted.
4.2 Horsham missed out on a promised collection and if this process limits the collection to specific chemicals then it is likely that the chemicals which have been stored long term will be disposed of inappropriately or have their identity masked. [Richard Steere]	The communication strategy should address this.
4.2 The community does not distinguish between chemicals. [Les Toohey]	Noted.
4.2 I suggest specifying what will not be accepted, such as motor oil and paint, and be explicit about what you do want to collect. [Bob Handby]	Agreed.
4.2 The community has an expectation that all chemicals can be removed and believes that it is more efficient to deal with all chemicals rather than focussing on just OCPs. If you are going to collect only OCPs you will need a buy-back scheme or a big stick. [John Hogan]	We believe that a buy-back or a highly regulated mechanism is unlikely. We also expect that much more than OCPs will come forward and, in common with usual practice, that other materials will be accepted.
4.2 There are chemicals that can not be used for a range of reasons which need to be disposed of. Funding would need to come from a variety of sources. Some of this will need to be user-pays. [Christopher Stebbing]	User-pays is more likely to be utilised for future unwanted chemicals.
4.2 There should be different collection styles for different regions depending on needs. I suggest Option 5, which involves setting cheap but secure bundled shipping containers for one month only and moving around the State from town to town. Have the collection for one month with an expert segregation team coming in to prepare the waste for moving to a consolidation store. [Bruce Burrow]	This could be an option.
4.2 I think we will get more OCP if the collection is for everything. [Bob Handby]	This will need to be considered when governments decide the scope of the collection program.
4.2 Some councils budget for chemical waste management through funds raised by the landfill levy. This is a good model for others. [Uldis Neilands]	Noted, but funding to date through this mechanism has been relatively modest.

Community Comments	OCP Consultation Panel Responses
<p>4.2 As part of the total scheme a mobile service, allied with a help line, might be considered to pick up residual holdings and for emergency situations. [Gary Newman]</p>	<p>For consideration during the implementation phase.</p>
<p>4.2 An unrestricted chemical collection program without limits would be far more effective in collecting the real targets, i.e. OCPs. The cost of setting up the infrastructure is probably the biggest cost. [Bob Handby]</p>	<p>Opinion noted.</p>
<p>4.2 We distributed flyers to farmers and the results of container returns shows they are very receptive. [Allan Bonollo]</p>	<p>Noted.</p>
<p>4.2 I believe 80% effectiveness in collection of OCPs is a very good result and in any case local government would probably not support ongoing collection because of the resource intensity. I support user-pays after the first collection. [Ian Manley]</p> <p>I agree, and think that travelling 30 km is about the limit and that limiting collections to OCPs is not effective use of resources. [Wendy Wait]</p>	<p>Opinions noted.</p>
<p>4.2.2 Earlier collections left behind about 10% of the OCPs, despite the “buy-back”. These were OCPs identified only later and OCPs held back deliberately. [Tim Hunter]</p>	<p>We believe that these two categories constitute the majority of the remaining OCP waste.</p>
<p>4.2.2 I believe the first round of the earlier collections collected 80% of the chemicals. I dispute that using the media etc. would improve this. Instead someone needs to visit each farm to retrieve banned chemicals. This needs to be a community-based program to ensure 100% coverage of all farms. [Farran Dixon]</p>	<p>The Panel agrees that personal approaches to potential holders would be best. However, while this may work in some areas, it would be too difficult in others (eg cities and larger towns).</p>
<p>4.2.2 Have we analysed procedural information on how each State undertook the DDT recall in 1987? Someone should assess the merits and pitfalls of all past and existing chemicals collection programs to determine the best way to move forward. [Unidentified, Merredin workshop]</p>	<p>Yes, we had a consultancy undertake such a review. The consultant’s report was received early in 1998.</p> <p>There is no simple translation from earlier collections since the earlier collections got the materials that people wanted to offer up, and the forthcoming ones will be dealing with material that has been withheld and/or unrecognised.</p>
<p>4.2.2 The DDT recall was easier because there was a national crisis which most farmers were aware of. Now this OCP collection program will require a different procedure to get the message out to the community to gather the remaining stocks of chemicals. An additional problem is the deterioration of containers since 1987, making identification significantly more difficult. [Unidentified, Merredin workshop]</p>	<p>Agreed.</p>

Community Comments	OCP Consultation Panel Responses
<p>4.2.3 The DDT recall (late 1980s) was a one-off process (ostensibly Option 2) but the reality is that it is now an ongoing program to collect surrendered OCPs. The State (WA) currently coordinates this at their cost (in effect, Option 4). This only refers to OCPs and if other unwanted chemicals are handed in they are refused. Our advice is to contact the Local Government Environmental Health Officer. You need to have a system to manage these other chemicals. Some Environmental Health Officers are enthusiastic, some are not. [Peter Rutherford]</p>	<p>This is only a partial Option 4, but it refers to an existing program.</p>
<p>4.2.3 If the program was legislated so that continuing to hold these chemicals was illegal then a one-off program may be able to work. [Rob McMiles]</p>	<p>There is a concern that a heavy regulatory approach to holders may encourage illegal dumping.</p>
<p>4.2.3 Option 2 is too finite and Option 4 too prolonged, so a finite program with limited follow-up would be most appropriate. [Chris Phillips]</p>	<p>This appears to be Option 3.</p>
<p>4.2.3 A straw poll of Bunbury workshop participants revealed that the majority preferred Option 4. The sense of the meeting was that OCPs were part of a much larger problem.</p>	<p>This preference was driven by the likelihood of significant quantities of other chemicals – OCPs would not be a significant proportion of this in volume terms.</p>
<p>4.2.3 Focus on other unwanted chemicals which will be banned in the future so ‘ongoing’ means every 1-2 years and so on. [Sandy Lyons]</p>	<p>Possibly Option 2 for OCPs and Option 4 for other unwanted chemicals?</p>
<p>4.2.3 You should look at practical experiences and follow Peter Rutherford’s guidance on the 1987 DDT recall which started as a one-off, but became an ongoing program. It will be expensive but it is the only option which will deliver the desired outcomes. Should we use up all existing stocks of unwanted chemicals immediately after banning? This would remove the problem of unwanted stocks. [Steve Benzie]</p>	<p>The management strategy to be used for any chemicals banned in the future will depend on the nature of the environmental, health and economic risks.</p>
<p>4.2.3 I believe there are two agendas: the Panel’s is OCPs and the meeting’s is all unwanted chemicals because OCPs have already been dealt with. [Tim Hunter]</p>	<p>Collecting all unwanted chemicals is the aim of the NCSDS, with those remaining OCPs as a priority.</p>
<p>4.2.3 OCPs are not allowed to be used, while other chemicals can be reused. In future, chemical purchasers should buy only as much as they need. There is a need for a good education program to ensure that future stocks of unwanted chemicals do not arise again. [Brian Gunn]</p>	<p>Agreed. There are many examples of improved practices along the lines indicated.</p>

Community Comments	OCP Consultation Panel Responses
4.2.3 There is an agreed voluntary industry levy on containers (80c per container in September 1997) to help industry and local government to manage containers. Such a scheme could be used for OCPs and other unwanted chemicals. I suggest collections at a shire level then transport at a regional then state level for destruction to save money and coordinate better. [Nahrel Dallywater]	Noted.
4.2.3 OCPs were once registered and other registered chemicals may be deregistered in the future. The issue is complex and it may be best to focus on OCPs only. [Chris Moon]	Opinion noted.
4.2.3 Option 4 is most appropriate because there is uncertainty as to how a collection program would be undertaken, when it will commence and when it will be completed. [Steve Fitzpatrick]	We cannot set dates at this stage. It is likely that collections will commence at different times in different regions. But an end date can be fixed with some degree of certainty and force.
4.2.3 You need to make sure there is at least one follow up collection. [Les Egerton]	Opinion noted.
4.2.3 I am not convinced that there is a problem in the Merredin region with OCPs. [Rob Meney]	Opinion noted.
4.2.3 The future management of chemicals is critical to ensure that this problem does not recur. [Heather Jones]	Agreed.
4.2.3 There needs to be some product stewardship in dealing with chemicals, in particular chemicals sold in the future. [Peter DiMarco]	Agreed.
4.2.3 There is a shared responsibility. [Peter Wahlsten]	The principle of product stewardship implies a shared responsibility by all in the chain of supply and use.
4.2.3 In the future, products that are deemed hazardous will have been cleared by the National Registration Authority; therefore they should be made responsible. [Rob Meney]	The approach to be used will depend on the circumstances under which a product becomes deregistered.
4.2.3 In future, if a product is suddenly deregistered, then it becomes a community problem; and if still registered but unwanted, then it is the farmer's problem. [Rob Meney]	A reasonable proposition.

Community Comments	OCP Consultation Panel Responses
<p>4.2.3 The collection scheme option adopted should be somewhere between Options 3 and 4. [Peter Rutherford]</p> <p>Have ongoing collections in the future where necessary. [Peter DiMarco]</p> <p>I do not agree with 6-monthly follow up – should be 6-weekly. [Rob Meney]</p> <p>Run Option 3 as long as farmers still have chemicals to hand in. [Peter Wahlsten]</p> <p>We should use the infrastructure established for OCPs to manage other unwanted chemicals. Infrastructure would have been expensive and could continue to be used. [Geoff Thomas; Stephen Addenbrooke]</p> <p>It is difficult to determine what the future problems are until the OCP collection is conducted. [Pat Meney]</p> <p>I do not like the idea of a levy system to fund the management of unwanted chemicals. [Rob Meney]</p>	<p>These views should be considered during further development of the NCSDS.</p>
<p>4.2.3 Option 1 could be considered if on-farm management techniques were established and appropriate. [John Andre]</p>	<p>Agreed, but efficient management techniques and disposal routes would be needed.</p>
<p>4.2.3 Option 1 could cause the program to be initially swamped with large volumes of chemicals. [Barbara Murrum]</p>	<p>Possibly so.</p>
<p>4.2.3 The second round of collection will probably collect more. [Max Harvey]</p>	<p>Some other programs have found this. Better education programs might help.</p>
<p>4.2.3 I support Option 4 with the follow-up being a smaller program but more than Dry Creek. Retain a few regional collection points. [John Andre]</p>	<p>This could be a good way to go, and will be considered during preparation of the NCSDS.</p>
<p>4.2.3 Using Option 4 should have full penetration so that follow-ups are at a reduced level as far as input is concerned. [Tim Marshall]</p>	<p>Opinion noted.</p>
<p>4.2.3 Option 4 is most suitable but follow-up collection programs should be funded by a levy on chemicals sold. There are systems in place for levies in e.g. mining. [Tim Marshall]</p> <p>I suggest that user-pays is a useful mechanism to pay for a collection program. [Andrew Thiele]</p>	<p>There is some industry resistance to levies, but they are often suggested to provide on-going funding.</p>

Community Comments	OCP Consultation Panel Responses
4.2.3 I support Option 4 because an infrastructure can be established which provides for quality management of hazardous materials. [Colin Daly]	Opinion noted.
4.2.3 This sort of process, if set up, should be ongoing. It should be able to operate on an annual basis and should also be the basis for recycling containers ourselves. In Canada, enormous amounts of plastic containers are being recycled and turned into fence posts – why can't we do it here? [Bob Barwell]	These are matters for the NCSDS. The container issue will be addressed under the National Strategy for Unwanted Empty Farm Chemicals Containers.
4.2.3 Are there any examples of ongoing collection schemes that we can draw on? [Wayne Davis]	The one-off collection in WA in 1989 has turned into an ongoing scheme for OCPs only. Because of uncertainty about the future of the local destruction facility, Agriculture WA has indicated that it will not continue to accept OCPs once the existing stockpile has been destroyed.
4.2.3 Dubbo participants indicated that they considered that a one-off collection would be insufficient.	Noted.
4.2.3 There is a risk in indicating that there will be a follow up as people will tend not to bring stuff in. [Paul Handsaker]	We need to look at ways of getting the message across to encourage people to bring their stuff in – perhaps making the first collection free, but not later ones.
4.2.3 I favour Option 4 with a periodic (e.g. yearly) follow-up. [Angus McDonald]	This option was favourably received by the other Dubbo participants.
4.2.3 NSW Agriculture view is that there should be a 3-phase program: 1 – big clean up 2 – orphans 3 – reduce possibility for these wastes to be produced (could start this right now). [Roger Toffolon]	Noted.
4.2.3 We need industry etc to take responsibility for small ongoing program. [Mark Gorta]	Noted.
4.2.3 An ongoing program is important because we need to be able to deal with chemicals that further down the track may become unacceptable. Philippa Rowland]	Noted.
4.2.3 What can be done with old/empty containers? [Bob Barwell]	Metal containers can be accepted for recycling if properly decontaminated. Plastic containers, once decontaminated, are usually shredded and landfilled.. However, landfills are not the desired destiny in the long term, and industry is investigating more sustainable recycling and recovery solutions.
4.2.3 The timeline is very optimistic – there will need to be negotiation between industry and government over funding – this will take some time. [Mark Gorta]	Agreed.

Community Comments	OCP Consultation Panel Responses
4.2.3 What are the costs expected to be? [Philip Palmer]	Of the order of \$10-50 million is the best estimate available (extrapolated from the McGuffog survey).
4.2.3 Is there any evidence of remaining quantities in domestic/household storage – what quantities are expected? [David Hughes]	They are expected to be very small compared with farm holdings, based on household collections in Melbourne and Sydney.
4.2.3 For a one-off collection, you are looking at anywhere from \$50-100 million nationally depending on distance and what you want collected. [Keven Thompson]	We would hope to get a significantly lower figure than this through utilisation of in-kind contributions.
4.2.3 In our shire, people didn't want 2,4,D – it worked out OK in the end because we used it, but in other cases where people don't know what the chemicals are, it could be a problem. [Unidentified, Canberra workshop]	In the case of OCPs, use is not an option.
4.2.3 We will be faced with a similar situation when organophosphates are withdrawn – we should have a structure in place able to cope with future families of pesticides withdrawn. [Robyn Holden]	Learning from and building upon past experiences would be desirable.
4.2.3 Use secondary schools as means of communication – you can get through to people from non-English speaking backgrounds and people with reading difficulties better that way. [Roger van Cornewal]	Suggestion noted.
4.2.3 Option 1 is not cost-free – I think it's the most expensive, as it has various hidden costs. "Option 5" is the best option – an ongoing national process. We will always use chemicals of some sort, so need to encourage people to use the best available and dispose properly of ones that are no longer to be used. [Michael Nicholls]	Opinion noted.
4.2.3 I also like "Option 5", perhaps with annual advertising. Perhaps collection should be free the first time, then charged for thereafter. [John Kent]	User-pays is likely to be the long term principle.
4.2.3 I suggest "Option 6" – ongoing clean-up until 2006, then industry to pay thereafter – this would allow reasonable time to come under the scheme. [Michael Thompson]	Suggestion noted.
4.2.3 With Options 5 or 6 it would be necessary to have parallel timelines for what industry is doing at the same time as the community. There is a fundamental need to be able to show that industry is reducing what is available to the community. Communications should be kept open to let people know what is happening in other sectors, eg industry. [Peter Waterman]	The agricultural and veterinary chemicals industry is moving to a waste reduction scheme, funded by a levy on non-returnable containers. Farmers are being educated about this. Product stewardship is also becoming an increasingly important issue.

Community Comments	OCP Consultation Panel Responses
4.2.3 The National Registration Authority should require refillable/returnable containers to be used. Monsanto is moving to this, but generically industry is not. [Phil Hansen]	Both voluntary and regulatory mechanisms could be considered to achieve this outcome.
4.2.3 Local government and farmers are working together on a farm container collection program. [Roy Smith]	Noted.
4.2.3 Our Shire has been collecting containers for 4 years. There is a need to collect everything in one hit, otherwise will not get it all. [Ray Macnamara]	Noted.
4.2.3 I disagree with a one-off collection – 1Étonne was first collected in a particular area, 400 kg and 500 kg over subsequent collections. The wrong message has been sent out so that some people will think the collectors will come back again next year. [Wayne Thompson]	Opinion noted.
4.2.3 If this is to work, you need a national campaign with TV, Service Clubs etc. Do a collection all at once (eg like Clean-up Australia Day). [Roy Smith]	One could do this all at once, a national OCP collection day, but most probably this will need to be done regionally.
4.2.3 The collection will not get cooperation if it happens during harvest time. The timetable will need to be driven by regional priorities. [Miles Blake]	Agreed.
4.2.3 Most regions will need 2 or 3 strategies. Let local people choose the strategies which are appropriate for their region. [Craig Darlington]	Agreed.
4.2.3 The core business idea is to get this out of the farms and it will take longer than you think – leave a month or more. You need to work through regional radio, etc. [Dennis Long]	By now most people wanting to get rid of OCPs will have passed their material in, so we have four groups left, that may be more difficult: <ul style="list-style-type: none"> – those who haven't heard – those holding for possible (illegal) uses – those holding unidentified OCPs – those who have inherited them.
4.2.3 There is no point giving people solutions without telling them there is a problem. You need firstly to convince people that there is a problem, then take the next 4 months to tell them about the solution. [Jim Straker]	Noted.
4.2.3 This could be made a flag for 2000 (the major project for 2000 – have a clean Australia). [Dennis Long]	Noted, but this is only likely to occur if politicians believe this is sufficiently important.
4.2.3 Don't expect local government to fund this – they cannot afford this. [Ray Macnamara]	We have been told this at other forums also, but have seen much willingness for local government to contribute in kind.
4.2.3 Continue the gun money levy to fund OCP collection and destruction. [Jim Straker]	Noted, but unlikely.
4.2.3 I am involved in the container collection scheme; industry which is contributing will pass costs on to the consumer, in price or on the bottom line. [Roy Smith]	Noted.

Community Comments	OCP Consultation Panel Responses
4.2.3 Include pharmaceuticals in all unwanted chemicals. [Derek Collin]	This is an option.
4.2.3 ANZECC intention is Option 4 and all unwanted chemicals. [Miles Blake]	Opinion noted, but ANZECC is still receiving advice about this.
4.2.3 All unwanted includes a vast list of chemicals, including organochlorines – so don't encourage everything, as this will increase the cost. [Jim Straker]	Opinion noted.
4.2.3 Initially do collection on a regional basis and funded on a regional basis, or shire basis. Educate people about why we have unwanted chemicals. Choose Option 4 – and make it user-pays in the long term. [Arthur Devin]	Opinions noted.
4.2.3 Part of rates of Brisbane City Council is an environmental levy of \$90. [Jim Straker]	Noted.
4.2.3 There is an American model where a local authority pays for a 3-year program to collect waste. [Arthur Devin]	Noted.
4.2.3 If we have a one-off collection, the experts will have trained the people before they leave, and the local people should be able to carry on with a continuing collection. [Paul Smith]	Such transfer of training is highly desirable.
4.2.3 The Queensland Environment Protection Policy will require each regional area to have a waste management plan to deal with their local wastes. [Jim Straker]	Noted.
4.2.3 Sump oil is not being dumped very often, it is reused or burnt by Council. I am not in favour of chemical container deposits, as we do not want pensioners and children collecting them for money. [Ray Macnamara]	Noted. This is a potential problem.
4.2.3 A problem is that people need 2 litres but can only buy 20 litres. I see a problem with outlying areas, as it may take 3 years to fill a truck. More remote areas may need a collection point open for 12 months. [Bob Martin]	In general, smaller containers are available, but at increased cost per litre. Collection schemes will have to be tailored to the needs of each area.
4.2.3 Let us have an intense period for collection of OCPs (Option 2) but afterwards get rid of other chemicals (Option 4), put in overdrums to send to waste disposal companies. [John Armbruster]	Opinion noted. There may be problems in mixing household chemicals in overdrums, especially if some are oxidisers.
4.2.3 Need to use local dump, from collection point on, to send in overdrum. [John Armbruster]	Collection points may be established in association with existing waste management facilities.

Community Comments	OCP Consultation Panel Responses
4.2.3 Householders have less knowledge of chemicals than farmers. [Paul Smith]	Agreed, in general.
4.2.3 Use some computer programs, such as Chemwatch. [Jim Straker]	Suggestion noted.
4.2.3 With Option 4, a disadvantage is that there is no incentive to decrease existing holdings of unwanted chemicals quickly. [Wayne Thompson]	This is a possible disadvantage.
4.2.3 There is a great increase in bulk sales of chemicals rather than small containers. [Roy Smith]	This is a positive trend.
4.2.3 Stick with core business – collect OCPs. It is up to regions if they want to continue collecting other chemicals – rate-payers will decide if they want to pay for this. [Roy Smith]	Opinions noted.
4.2.3 There is a need to give priority to getting rid of those chemicals that are banned. [Ray Macnamara]	
4.2.3 Option 2 would need to run for a minimum of 3 months with a very good publicity campaign. Use ABC rural radio sessions. [Dennis Long]	
4.2.3 Collect everything since people will bring other materials as well. [Mark Hoogsteyns]	
4.2.3 I am not sure about collecting everything. If chemicals are still being used, the local people can divert them to people who will use them. [Bernie Milford]	
4.2.3 I think Queensland Farmers Federation would be opposed to the collection of currently registered chemicals as their advice to members was to buy sufficient for the purpose rather than store chemicals. [Jamie Cupples]	
4.2.3 There are real problems with liability in relation to handing on chemicals because of possible contamination. If there were to be ongoing future collections, they should be funded out of a levy built into the price of products. [John Ready]	
4.2.3 I support Option 4, as we need ongoing mechanisms for dealing with problems as they arise. Look at linking in with Clean-up Australia Day. [Peter Brock]	
4.2.3 Brisbane City Council has an Australia Day campaign system. Advertising is very specific on what they can bring because of cost. Use existing infrastructure, but need expertise. [Trevor Lloyd]	

Community Comments	OCP Consultation Panel Responses
<p>4.2.3 There are extensive programs for household chemicals in Sweden. Householders are much less well informed about the chemicals they hold than are farmers. Therefore you need a different strategy for dealing with household chemicals. [Lena Aahlby]</p>	<p>Noted.</p>
<p>4.2.3 We are developing a waste exchange register, which will go up on the Local Government Association of Queensland website. [David Miles]</p>	<p>Noted.</p>
<p>4.2.3 Labelling of household chemicals is inadequate – much poorer than for farm chemicals. [Jamie Cupples]</p>	<p>Noted.</p>
<p>4.2.3 For a general chemical collection, you will need a coordinating body such as for Clean-Up-Australia Day, supplemented by a mechanism for dealing with emergency requests. [Rod Schultz]</p>	<p>Opinions noted.</p>
<p>4.2.3 It is a local government responsibility as it is householders' waste, and they should be able to charge for the service. [Rob Curtis]</p>	
<p>4.2.3 The person who bought a product that is still registered should pay for its disposal. OCPs are different, as the Government prevents their use. [Jamie Cupples]</p>	
<p>4.2.3 You need to start with the need to reduce environmental contamination and not be forced to phase out chemicals simply in response to international pressure. [Rod Schultz]</p>	
<p>4.2.3 Initially you have to get rid of all large stocks, then dribs and drabs. You need to have someone at the tip say once a month who knows about chemicals. This would not really be expensive, especially in comparison with the costs if the chemicals were not collected safely. [Charlie Halloran]</p>	<p>This is a version of Option 4 and training will clearly be needed.</p>
<p>4.2.3 With Option 4, there is a diseconomy of scale over time. This option would be made more feasible if other (new) chemicals were included further down the track. [Nigel Green]</p>	<p>Agreed. Industry will have a role in helping to reduce future unwanted pesticides.</p>
<p>4.2.3 Is much of the end product usable – what is the economy of scale at the end? I love Option 4, but it is probably not economic.</p> <p>I envisage using Option 3 to start with, but what will eventually happen is that we will start collecting other products, and companies will start to look at how they can reuse the other stuff – so it will be possible move to Option 4 then. [Sue Nixon]</p>	<p>Reuse of chemicals handed in is likely to be problematical.</p> <p>There are similarities between this and the Industry Waste Reduction Agreements, which could include such components in the future.</p>

Community Comments	OCP Consultation Panel Responses
4.2.3 If collecting other pesticides as well, are they destructible (apart from arsenicals)? [Gerry Wood]	They are generally easier to destroy than OCPs. (But arsenic can never be destroyed chemically).
4.2.3 One of the difficulties with Option 4 is maintaining public interest. [Nigel Green]	Agreed.
4.2.3 There is no point in putting in place something along the lines of Option 4 if only looking at the next set of chemicals to be dealt with – this seems self-defeating. Option 4 seems to be waiting for deregistration and the onus should be on industry. [Jayne Weepers]	Having Option 4 relieves pressures on users and buyers to hand in unwanted chemicals and this may act against good practice. Agreed.
4.2.3 From now on, there should be more onus on the individual when buying stuff – there should be information on containers to let users know that they will be responsible for the safe and proper disposal of the chemicals. [Alison Scott]	The Panel sees merit in this idea but thinks that any messages regarding the onus of responsibility for the waste should be accompanied by information on how to manage and dispose of the chemicals safely and properly.
4.2.3 We've looked at this fairly seriously with waste oil. Once a disposal facility is available, stuff begins to come in – I think the same thing will happen with chemicals. I don't think you can look at OCPs in isolation. I find that when you educate people, they will tend to try to do the right thing – we are being overly pessimistic. [Rob Fischer]	Agreed and thanks for the encouraging thought.
4.2.4 Education program would help facilitate a one-off collection program. [John Edwards]	Agreed.
4.2.4 I support strong emphasis on education for any collection program. Use service clubs within particular communities to facilitate collections similar to that used for pharmaceutical collections. [Rob McMiles]	This seems a possible model for some areas.
4.2.4 Collections will pick up much more than just OCPs – I have been involved in previous programs at council level and included some voluntary work – local media supported this. You need a good focus on getting information to the farmers. [Geoff Harcombe]	Noted.
4.2.4 WA Farmers Federation has a strong focus on OCP collection. [Evelyn Brand]	This is recognised from strong WAFF participation in the consultation process.
4.2.4 Flexibility is important – you shouldn't lock in to a date but to a process. The biggest issue is to communicate with older people more set in their ways, especially as we have an increasingly aging population. [Peter Waterman]	Opinion noted.

Community Comments	OCP Consultation Panel Responses
4.3 The collections paper appears to be silent on ownership of waste once it reaches a collection point. This will need to be addressed – I am concerned that local government might be perceived as responsible. [Michael Nicholls]	This will be addressed in the negotiation process outlined in Section 2.7.1 of the OCP Waste Management Plan.
4.3.1 Personnel involved must have full and appropriate training because of the potential hazards. [Paul Davis]	Agreed.

Section 5: Future management of agricultural and veterinary chemicals

Community Comments	OCP Consultation Panel Responses
Nil comments.	

Section 6: Conclusions

Community Comments	OCP Consultation Panel Responses
Nil comments.	

Appendix A: National Collection, Storage and Destruction Scheme Steering Committee membership

Community Comments	OCP Consultation Panel Responses
Nil comments.	

Appendix B: Possible institutional relationship between a coordinating body and other national chemicals collection scheme players

Community Comments	OCP Consultation Panel Responses
Nil comments.	

Appendix C: Chemical collection program case studies

Community Comments	OCP Consultation Panel Responses
Case Study 9 There is more unwanted chemical waste present than the 180 kg suggested in the survey (Northern Midlands Council, Tasmania). However the quantity is unlikely to be sufficient to warrant the establishment of a treatment facility. [Peter Valentine]	Probably, but it is hard to get accurate figures and the 180 kg could be what will be surrendered.

APPENDICES

APPENDIX I: NATIONAL PROTOCOL FOR COMMUNITY CONSULTATION

APPENDIX II: SAMPLE LETTERS OF INVITATION TO ATTEND WORKSHOPS

APPENDIX III: LIST OF WRITTEN SUBMISSIONS RECEIVED

APPENDIX IV: SAMPLE MEDIA RELEASE

APPENDIX V: LIST OF MEDIA ORGANISATIONS CONTACTED

APPENDIX VI: WORKSHOP AGENDA

APPENDIX VII: LIST OF ATTENDEES AT THE OCP WORKSHOPS

APPENDIX VIII: LIST OF INFORMATION RECEIVED FROM THE COMMUNITY

APPENDIX IX: WORKSHOP EVALUATION FORM

APPENDIX X: FEEDBACK FROM THE EVALUATION FORMS



National Protocol for Community Consultation on Scheduled Wastes

Background

A small percentage of hazardous wastes has been regarded for a long time as intractable or difficult to dispose of without special technologies and facilities. Recent technological advances now allow optimism that many of these wastes may be treated in Australia.

Some of them, such as polychlorinated biphenyls (PCBs) and organochlorine pesticides have been around for a long time waiting for acceptable disposal. They are now known as scheduled wastes as they have been included in a schedule to the Australian and New Zealand Environment Conservation Council's (ANZECC) National Strategy for the Management of Scheduled Wastes.

A national approach is being implemented to manage these wastes in an environmentally responsible and acceptable way. The approach follows the work of the Independent Panel on Intractable Waste. The Panel employed an approach that identified several waste streams able to be treated by a range of small, possibly relocatable, technologies. The Panel's consultative approach was aimed at obtaining broad community acceptance for its findings and recommendations.

ANZECC has decided that the Scheduled Wastes Management Group (SWMG) in co-operation with the National Advisory Body (NAB) should prepare a National Protocol for Community Consultation.

Aims

The following consultation and participation aims have been agreed by the NAB and the SWMG and will be adopted in the development of management plans:

1. To enhance the development, adoption and implementation of effective management plans for scheduled wastes.

2. To maximise understanding of and involvement in the debate related to the management of scheduled wastes.
3. To place scheduled waste management issues clearly within the context of broader waste management issues, including those which may arise throughout the process of development and implementation of management plans.
4. To achieve the most societally acceptable outcome possible in the development and finalisation of management plans, taking account of environmental, economic and social factors.

Principles

The NAB and the SWMG, in facilitating the consultation and participation process, will seek to achieve clarity of roles and responsibilities, timeliness of decision making and information delivery, access to information and personnel, easily comprehensible information and processes, continuity, feedback mechanisms, openness, fairness and equity.

We will:

1. communicate in a clear and timely manner accommodating comments on the scope, aims and expected outcomes for each stage of discussion and submissions.
2. provide comprehensive and timely information to the community to encourage fair and informed discussion of issues.
3. support, to the maximum extent possible, the consultative process by providing information requested by those seeking to provide input.

4. establish clear and realistic timelines for all forms of input which reflect, as much as is possible, a sensitivity to the resources available to individuals and groups concerned.
 5. translate key information into plain language for wider community consideration, especially when dealing with technical issues.
 6. assist individuals and groups in a variety of practical ways to engage in the consultative process, within the limitations of the scheduled waste budget, paying particular attention to equal opportunity principles.
 7. pay specific attention to the inclusion of people from non-English speaking backgrounds in the consultation process, within the limitations of the scheduled wastes budget.
 8. provide frequent feed-back, including information relating to: emerging technologies, key outcomes from NAB and SWMG meetings and consultations, the nature of interested people's contributions, and final key recommendations.
 9. ensure that people who enter consultative processes at different stages will, as much as possible, be able to influence the direction of the management plan development.
 10. stimulate conciliatory and constructive exchange of views and genuinely attempt to address, without prejudice, the major issues involved in the management plans.
 11. frequently monitor and evaluate the effectiveness of the consultation program during and at the end of each stage of the management plan process.
 12. regularly review, update and activate contact lists of individuals and organisations with an interest, or a potential interest, in the management of scheduled wastes.
 13. share the responsibilities for effective consultation with those who enter into the consultative process.
- consideration of target groups (for example, consultation on hexachlorobenzene is likely to be more localised than that for other management plans);
 - mechanisms for effective consultation (for example, the approach used in consultation with the rural sector for OCPs is likely to be very different than that used in Botany for hexachlorobenzene);
 - clear timelines; and
 - resourcing (levels and types of assistance will vary).

Sharing Responsibilities

The roles of the NAB and SWMG are identified at Appendices B and C of the report of the Scheduled Wastes Working Group (SWWG) to ANZECC (May 1993). Appendix B states that the role of the SWMG is "... to implement, review and advise [ANZECC] on the National Strategy for the Management of Scheduled Waste. In particular, in consultation with the NAB, the SWMG is to:

- ensure that the community is adequately consulted through the NAB and through other means, such as Public Hearings and targeted consultation, education and information programs."

Appendix C states that the role of the NAB is to advise the ANZECC on:

- community consultation/education and information programs; and
- any other relevant issues on which ANZECC or the SWMG seeks advice.

This makes it clear that while the SWMG is ultimately responsible for making sure the public is adequately consulted, the NAB has the responsibility of providing advice on consultation programs.

The NAB has considered the approach to be adopted for major public events in the consultation process. These events, including hearings and workshops, will be led by a balanced sub group of the NAB, including the Chair. The SWMG will provide technical support on these occasions.

While the protocol will apply to all of the management plans, each plan will require a specific implementation strategy for consultation. These strategies will include, among other things;

*Prepared by National Advisory Body and
Scheduled Wastes Management Group*

Revised August 1996

APPENDIX II: SAMPLE LETTERS OF INVITATION TO ATTEND WORKSHOPS



Established by the Australian and New Zealand
Environment and Conservation Council

Scheduled Wastes National Advisory Body

SAMPLE TARGETED LETTER OF INVITATION

I am writing to ask for your involvement in the final stages of the development of a management plan for the unwanted quantities of organochlorine pesticides which are held by Australian farms and households.

This management plan is being prepared under the auspices of the council of Australian environment Ministers (ANZECC). Two bodies have been established by the Ministers – the Scheduled Wastes Management Group and the National Advisory Body on Scheduled Wastes – to undertake this work and a panel drawn from the Advisory Body is managing the public consultation process associated with the development of the management plan.

The management plan provides for collection, storage, transport and destruction of scheduled organochlorine pesticide wastes. There is also a discussion paper on proposals for a national collection, storage and destruction scheme. This has been developed by a steering committee with a brief which includes other unwanted chemicals along with the scheduled organochlorine pesticide wastes.

The first draft of the management plan was prepared in September 1996 and extensive public involvement (including written submissions and 30 forums around Australia) has enabled us to prepare the draft final management plan which will be used in the final phase of public consultation.

In this final consultation phase we will be bringing together groups of important stakeholders in a series of ten regional 1-day workshops. These stakeholders (including you or your organisation where this is applicable) are those whom we believe will have an important role to play in the effective implementation of the management plan and of possible option(s) which may be chosen for a collection, storage and destruction scheme. The aim is to subject the documents at their current stage of development to thorough and practical scrutiny in a variety of regional settings by people and organisations with a key role to play in their effective implementation. Following the workshops we anticipate that some further amendments will be made to the management plan which will then be submitted to the ANZECC Ministers for consideration by the end of the year, along with recommended options for a national collection, storage and destruction scheme.

The details of workshops relevant to New South Wales are:

DUBBO

Date: Tuesday 15 July

CANBERRA

Date: Thursday 17 July

STANTHORPE

Date: Wednesday 23 July

Time: 9.30am-4.30pm
Venue: Country Comfort Inn,
Newell Highway,
West Dubbo NSW 2830

Time: 9.30am-4.30pm
Venue: Country Comfort Inn,
102 Northbourne Avenue,
Canberra ACT 2600

Time: 9.30am-4.30pm
Venue: The Vines Motel,
2 Wallangarra Road,
Stanthorpe QLD 4380

The relevance of the Canberra and Stanthorpe workshops to New South Wales participants will be through the consideration of cross-border issues and possible cooperative arrangements. Participation in more than one forum is likely to be appropriate for organisations with a Statewide or national role, and the identity of organisational representatives may vary according to location.

The preparation of this management plan is important to the health of Australia's people and environment. **For this reason, it is important that you or, where applicable, a senior representative of your organisation participate in the workshops.** Please complete the enclosed reply slip and return it to us by 30 May 1997; it would help us to structure the workshops if you also indicated any matters that you or your organisation feel should be discussed there.

A package of workshop materials will be forwarded upon receipt of your response. The Panel looks forward to meeting you at the workshop.

We also welcome written submissions on the draft final management plan. Please forward any submissions to the Waste Management Secretariat, c/- Environment Australia, 40 Blackall Street, Barton, ACT 2600 **by 1 August 1997.**

If you have any questions in relation to the matters raised in this letter please contact Dr Paul Bainton at the Waste Management Secretariat on telephone (06) 274 1475 during business hours.

Yours sincerely



Professor Ian D Rae
Chair
National Advisory Body and
Scheduled Wastes Management Group

Workshops on Organochlorine Pesticide Waste Management Plan and National Collection, Storage and Destruction Scheme

Organisation (if applicable): _____

DUBBO WORKSHOP – TUESDAY 15 JULY 1997

Nominated

Delegate: _____

Address: _____

Phone: _____ Fax: _____

Email: _____

CANBERRA WORKSHOP – THURSDAY 17 JULY 1997

Nominated

Delegate: _____

Address: _____

Phone: _____ Fax: _____

Email: _____

STANTHORPE WORKSHOP – WEDNESDAY 23 JULY 1997

Nominated

Delegate: _____

Address: _____

Phone: _____ Fax: _____

Email: _____

Please indicate any issues which you/your organisation would like to see discussed at the workshops:

Please return this form to the Waste Management Secretariat on fax (06) 274 1230 or by mail to 40 Blackall Street, Barton, ACT 2600 by Friday 30 May 1997.



Established by the Australian and New Zealand
Environment and Conservation Council

Scheduled Wastes National Advisory Body

SAMPLE GENERIC LETTER OF INVITATION

An invitation ...

I am writing to invite you to participate in the final stages of development of a management plan for the unwanted quantities of organochlorine pesticides which are stored on some farms and in some homes around Australia.

This management plan is being prepared under the auspices of the council of Australian environment Ministers (ANZECC). Two bodies have been established by the Ministers – the Scheduled Wastes Management Group and the National Advisory Body on Scheduled Wastes – to undertake this work and a panel drawn from the Advisory Body is managing the public consultation process associated with the development of the management plan.

The management plan provides for collection, storage, transport and destruction of scheduled organochlorine pesticide wastes. There is also a discussion paper on proposals for a national collection, storage and destruction scheme. This has been developed by a steering committee with a brief which includes other unwanted chemicals along with the scheduled organochlorine pesticide wastes.

The first draft of the management plan was prepared in September 1996 and extensive public involvement (including written submissions and 30 forums around Australia, which many recipients of this letter will have attended) has enabled us to prepare the draft final management plan which will be used in the final phase of public consultation.

In this final consultation phase we will be holding a series of ten regional 1-day workshops. The aim of these workshops is to subject the documents at their current stage of development to thorough and practical scrutiny in a variety of regional settings. Following the workshops we anticipate that some further amendments will be made to the management plan which will then be submitted to the ANZECC Ministers for consideration by the end of the year, along with recommended options for a national collection, storage and destruction scheme.

Details of the location and times of workshops are provided on the enclosed reply slip.

Participation in more than one forum is likely to be appropriate for organisations with a Statewide or national role, and the identity of organisational representatives may vary according to location.

The preparation of this management plan is important to the health of Australia's people and environment.
Should you wish to attend a workshop please return the reply slip to us as soon as possible and by

PTO

25 June 1997 at the latest. It would help us to structure the workshops if you also indicated any matters that you or your organisation feel should be discussed there.

A copy of the draft final management plan, which is a key document for use in the workshops, is included with this letter. A package of additional workshop materials will be forwarded upon receipt of your response. Your early response will assist us in despatching these materials to you in a timely fashion.

Considerable interest has already been expressed in the workshops and some limits may need to be placed on the number of participants in some locations. We hope that this will not be the case, but if it is, places will be allocated according to order of reply. The Panel looks forward to your response and meeting you at the workshops.

We also welcome written submissions on the draft final management plan. Please forward any submissions to the Waste Management Secretariat, c/- Environment Australia, 40 Blackall Street, Barton ACT 2600 **by 1 August 1997.**

If you have any questions in relation to the matters raised in this letter please contact Dr Paul Bainton at the Waste Management Secretariat on telephone (06) 274 1475 during business hours.

Yours sincerely



Professor Ian D Rae
Chair
National Advisory Body and
Scheduled Wastes Management Group

Workshops on Organochlorine Pesticide Waste Management Plan and National Collection, Storage and Destruction Scheme

Please indicate the workshop you wish to attend by ticking the appropriate box:

- Bunbury:** 9.30am-4.30pm, Monday 7 July, Lighthouse Beach Resort Hotel, Carey St, Bunbury WA 6230
- Merredin:** 9.30am-4.30pm, Wednesday 9 July, Merredin Oasis Hotel, Great Eastern Hwy, Merredin WA 6415
- Hahndorf:** 9.30am-4.30pm, Friday 11 July, Hochstens of Hahndorf, 145A Main St, Hahndorf, SA 5245
- Dubbo:** 9.30am-4.30pm, Tuesday 15 July, Country Comfort Inn, Newell Hwy, West Dubbo, NSW 2830
- Canberra:** 9.30am-4.30pm, Thursday 17 July, Country Comfort Inn, 102 Northbourne Ave, Canberra, ACT 2600
- Stanthorpe:** 9.30am-4.30pm, Wednesday 23 July, The Vines Motel, 2 Wallangarra Rd, Stanthorpe, Qld 4380
- Townsville:** 9.30am-4.30pm, Friday 25 July, Seagulls, 74 The Esplanade, Townsville, Qld 4810
- Hobart:** 9.30am-4.30pm, Wednesday 30 July, Hadley's Hotel, 34 Murray Street, Hobart, Tas 7000
- Horsham:** 9.30am-4.30pm, Friday 1 August, Vic. Inst. for Dryland Agriculture, Natimuk Rd, Horsham, Vic 3401
- Darwin:** 9.30am-4.30pm, Tuesday 5 August, Hotel Darwin, 10 Herbert St, Darwin 0800.

Name: _____ Organisation (if any): _____

Address: _____

Phone: _____ Fax: _____
Email: _____

Please indicate any issues which you/your organisation would like to see discussed at the workshops:

Please return this form to the Waste Management Secretariat on fax (06) 274 1230 or by mail to 40 Blackall Street, Barton, ACT 2600 by Wednesday 25 June 1997.

APPENDIX III: LIST OF WRITTEN SUBMISSIONS RECEIVED

Submission Number	Name and Organisation	Date
PIP Phase 3 - Submission 1	Douglas McGuffog McGuffog & Co	11 June 1997
PIP Phase 3 - Submission 2	P R Blake Queensland Transport	16 June 1997
PIP Phase 3 - Submission 3	Marie O'Dea Western Australian Farmers Federation	23 June 1997
PIP Phase 3 - Submission 4	Mark Labaz & Sally Bainbridge City of Mitcham	26 June 1997
PIP Phase 3 - Submission 5	B Luke Barry Luke & Associates	28 June 1997
PIP Phase 3 - Submission 6	G J Edwards Tweed Shire Council	23 June 1997
PIP Phase 3 - Submission 7	Bruce Gotting ICI Chemicals & Plastics	30 June 1997
PIP Phase 3 - Submission 8	Czes Grygorcewicz SA Dept of Industrial Affairs	4 July 1997
PIP Phase 3 - Submission 9	Ian Calder SA Health Commission	11 July 1997
PIP Phase 3 - Submission 10	Joan Mom Australian Chemical Trauma Alliance	25 July 1997

Submission Number	Name and Organisation	Date
PIP Phase 3 - Submission 11	The Hon Brian Littleproud, MLA QLD Minister for Environment	18 July 1997
PIP Phase 3 - Submission 12	Patricia Keill Country Women's Association of NSW	24 July 1997
PIP Phase 3 - Submission 13	Ted Walton	July 1997
PIP Phase 3 - Submission 14	Rob Pollock Latrobe Council	22 July 1997
PIP Phase 3 - Submission 15	John Andre South Australian Farmers Federation	29 July 1997
PIP Phase 3 - Submission 16	Randall Scott NT Dept Lands, Planning and Environment	5 August 1997
PIP Phase 3 - Submission 17	Colin McLean Sydney Water	31 July 1997
PIP Phase 3 - Submission 18	Claude Gauchat Avcare	7 August 1997
PIP Phase 3 - Submission 19	Wendy Craik National Farmers' Federation	8 August 1997

Submission Number	Name and Organisation	Date
PIP Phase 3 - Submission 20	Jaimie Clarke Hobart City Council	8 August 1997
PIP Phase 3 - Submission 21	Darrell Thornthwaite ACT Fire Brigade	12 August 1997
PIP Phase 3 - Submission 22	Adrian Jones Farm Chemical Users Course, Victoria	14 August 1997
PIP Phase 3 - Submission 23	Sarah Moles Toowoomba & Region Environment Council	18 August 1997
PIP Phase 3 - Submission 24	K P Sheridan NSW Agriculture	14 July 1997
PIP Phase 3 - Submission 25	Owen Ashby Australian Institute of Environmental Health	19 August 1997
PIP Phase 3 - Submission 26	Anita White United Graziers' Association of Queensland	18 August 1997
PIP Phase 3 - Submission 27	Gary Parrott Agricultural and Veterinary Chemicals Policy Committee	4 September 1997
PIP Phase 3 - Submission 28	David Roby	8 September 1997
PIP Phase 3 - Submission 29	South East Queensland Regional Organisation of Councils	1 October 1997



Scheduled Wastes
**National Advisory
Body**

MEDIA RELEASE

28 July 1997

Territory Involved in Final Pesticide Consultations

The final public consultation phase in the development of a national management plan for Australia's scheduled organochlorine pesticides (OCPs) comes to the Northern Territory next week with a workshop in Darwin.

OCPs are persistent, hazardous wastes. They include DDT, dieldrin, lindane, aldrin and heptachlor. They are no longer registered for use and can be found stored on farms, in business premises and households, and in government agencies throughout Australia. The longer these unwanted pesticides remain, the greater is the risk of them contaminating the environment and our food chain, and of harming Australia's reputation as a clean food producer.

The details of the workshop are:

DARWIN

Date: Tuesday 5 August 1997
Time: 9.30am - 4.30pm
Venue: Hotel Darwin
10 Herbert Street
Darwin 0800

This is one of a series of ten regional workshops which are being held in all States and Territories in July and early August.

The workshop will be facilitated by members of a Panel from the National Advisory Body (NAB) on Scheduled Wastes. The NAB is an representative body made up of environment groups, industry, local government, farmers and trade unions. It has been established by Environment Ministers from all States/Territories and the Commonwealth to work with government to develop national management plans for a range of organochlorine wastes, including OCPs, which have proven difficult to deal with in the past. The NAB has particular responsibility for advising Ministers on community views and facilitating community input into the plans.

The facilitators for the Darwin workshop will be Professor Ian Rae (independent chair of the NAB), Ms Mariann Grinter (Nature Conservation Council of NSW), and Mr Claude Gauchat (Avcare).

Essential background material for the workshop, including a Draft Final Management Plan and a Discussion Paper on the Collection and Destruction of Unwanted Farm and Household Chemicals, is available by calling toll free 1800 657 945, faxing the Waste Management Secretariat on (06) 274 1230, or by Email on ocp@dest.gov.au.

(The management plan provides for the storage, collection, transport and destruction of OCPs. The discussion paper considers other unwanted chemicals along with OCPs.)

The workshop, which is free and open to any interested person, will bring together groups of important stakeholders. The stakeholders are those who are likely to have important roles to play in the effective implementation of the management plan and in possible options which may be chosen to collect, and destroy unwanted farm and household chemicals, including OCPs.

The aim of the series of workshops is to subject the Management Plan and the Discussion Paper to thorough and practical scrutiny. This will be done in a variety of regional settings, by organisations which will have important roles to play in making the plan and any collection scheme work.

Following the workshops it is anticipated that the management plan, which underwent significant modification after earlier public consultations, will be further amended and submitted to the Environment Ministers for consideration by the end of the year, along with recommended options for a national collection, storage and destruction scheme.

ENDS

A media technical brief is attached.

Media Enquiries:

Prof Ian Rae	(03) 9397 3794	(019) 446 824
Mr Claude Gauchat	(02) 9922 2199	(0411) 492 491
Ms Mariann Grinter	(06) 288 5881	(0417) 243 753



MEDIA BACKGROUND BRIEF

ACTION TO MANAGE UNWANTED ORGANOCHLORINE PESTICIDES!!

Australia is developing a plan to clean up our unwanted organochlorine pesticides which are presently being stored around the country.

What are organochlorine pesticides? What do they look like?

The pesticides covered include DDT and dieldrin and those pesticides used to prevent termites from destroying buildings, heptachlor and chlordane. In all there are 13 pesticides on the list of scheduled wastes.

Since they were first introduced into Australia in the mid 40s, organochlorine pesticides have been used in many commercial products, in different forms (eg powders and liquids) and in different types and sizes of containers. Common product names include Hortico Dieldrin Dust, Mustex 25% DDT, Shell Dieldrex and Yates Garden Dust.

They may be found in small to large containers, ranging from home garden packs (such as glass poison bottles or cardboard shaker packs) to large steel drums. Sizes of containers range from 50 mL to 200 litres. Up to 150 commercial products may have at one time been registered in Australia, although they have been deregistered for several years now. While most of these containers will have been clearly labelled, the original labels may have since deteriorated or even been lost.

Where have they come from? Where can they be found ?

Originally, organochlorine pesticides were widely used to protect crops, livestock, buildings and households from the damaging effects of insects

Deregistration has left Australia with stocks of unused and unwanted organochlorine pesticides. Unable to be used, and with no easily accessible means of destruction, these pesticides are now being stored by individuals and, in some cases government agencies, until a permanent solution to manage and destroy them is developed.

We do not have accurate information on the quantities of these unwanted organochlorine pesticides that remain. However, we do know that they may be found on farms, in business premises and households throughout Australia.

A 1996 survey of Queensland farmers shows that there may be *at least 20 tonnes* of unwanted organochlorine pesticides in that State alone even after the extensive collection program which occurred there in 1987. The longer they remain unrecovered or poorly managed the greater the risk of them getting into our environment and our food chain!

Why are organochlorine pesticides harmful?

Generally:

- the pesticides resist degradation by chemical, physical or biological means – that is they are persistent and have half-lives – the time taken for half of the quantity of pesticide to be degraded – ranging from months to years and in some cases decades;

- the pesticides are toxic to humans and other animals and are very highly toxic to most aquatic life – that is they can have a serious short-term and long-term impacts at low concentrations – non-lethal effects such as immune and reproductive damage some of these pesticides may also be significant; and
- the pesticides build up in the fatty tissues of humans, plants and animals – most of them are attracted to fatty tissues and organs and are accumulated significantly in animals such as fish – this means that animals high up the food chain such as birds of prey and humans can accumulate higher levels of the pesticides than animals lower down the food chain.

While these general observations are true, it is important to remember that the organochlorine pesticides are a diverse group of chemicals and the toxicity, the potential to build up in tissues and their persistence varies.

What will happen if we don't manage them safely?

Unwanted, stored organochlorine pesticides are unlikely to harm health or the environment while they remain contained.

However, poor management may result in unregistered use, spills or leaks, exposing and possibly harming people and the environment. Poor management has already severely affected markets for primary produce. In the late 80s, the United States banned the import of Australian beef for a short time because residues of dieldrin were detected in some samples. Proper management and destruction is needed to avoid similar trade problems in future.

How does Australia compare internationally?

Australia does not allow the use of the more persistent and toxic organochlorine pesticides. This is in line with the many other developed countries which have banned their use.

The use of organochlorine pesticides built up from the mid-1940s and peaked around 1975. By the end of 1985, most agricultural applications of the organochlorine pesticides had ceased.

The only organochlorines still registered for use after this time were chlordane and heptachlor and these were permitted for use by licensed operators for termite control. Now even these two pesticides have been phased out in all areas of Australia except the Northern Territory. Phase out from use in the NT must be complete by 30 June 1999.

A recent international development is the global move to phase out a range of persistent organic pollutants which include organochlorine pesticides. The management plan will help Australia to meet its international commitment to safely manage persistent organic pollutants.

APPENDIX V: LIST OF MEDIA ORGANISATIONS CONTACTED

Western Australia

MEDIA TYPE	COMPANY
NEWSPAPERS	Warren-Blackwood Times
	Northern Guardian
	Collie Mail
	Great Southern Herald
	Mandurah Mail
	Mandurah Telegraph
	Wheatbelt Mercury
RADIO	6WF
	6IX
	6MM
	6PR
	Radio National
	Radio 94.5 FM
	PM FM 92.9
	Triple M Perth
	6MD
	6TZ
	ABC Radio South West
	ABC Regional Production Unit
TELEVISION	ABW2
	NEW10 News
	STW 9 News
	TVW7 News
	GWN Television News

South Australia

MEDIA TYPE	COMPANY
NEWSPAPERS	The Advertiser
	Sunday Mail
	Eastern Courier Messenger
	The Barossa and Light Herald
	The Bunyip
	The Loxton News
	The Courier

	Murray Valley Standard
	The Times
RADIO	5AA
	5AN/Radio National
	5DN
	5AD FM
	SAFM
	Triple M Adelaide
	5UV
	Alta Mira FM
	Coast FM
	5MU
	ABC Regional Production Unit
TELEVISION	Head TV News/
	ABS Chan 2
	ADS Chan 10
	NWS Chan 9
	SAS Chan 7
	RTS Chan 5A

Southern New South Wales & Australian Capital Territory

MEDIA TYPE	COMPANY
NEWSPAPERS	Canberra City News
	The Canberra Times
	The Chronicle
	Tuggeranong Valley View
	The Daily Telegraph
	Sun Herald
	Sunday Telegraph
	Sydney Morning Herald
	The Western Advocate
	Western Times
	Blue Mountains Gazette
	Highlands Post
	Southern Highlands News
	The Canowindra News
	Cooma-Monaro Express

	Coonamble Times
	The Cootamundra herald
	Southern Weekly Magazine
	Cowra Guardian
	Daily Liberal
	Forbes Advocate
	Gilgandra Weekly
	The District Times
	The Goulburn post
	Mudgee Guardian & Gulgong Advertiser
	Narromine News & Triangle Advocate
	Oberon Review
	Central West Sunday
	Central Western Daily
	Parkes Champion Post
	Queanbeyan Age
	Town & Country Goulburn
	The Riverina Leader
	Wagga Daily Advertiser
	Yass Tribune
	Young Witness
RADIO	Radio 2CA
	Radio 2CC
	Radio 2CN
	Radio 106.3 Canberra FM
	Radio FM 104.7
	Radio 2BL
	Radio 2GB
	Radio 2KY
	Radio 2UE
	Radio 2WS FM
	MIX 106.5 FM
	Triple M Sydney
	Radio 2BS
	Radio 2CR
	Radio 2DU
	Radio 2GN
	Radio 2GZ
	Radio 2LF
	Radio 2MG

	Radio 2MO
	Radio 2PK
	Radio 2WG
	ABC Radio Riverina
	ABC Regional Production Unit
	Radio 2GCR
	Radio 2MCE FM
TELEVISION	ABC Chan 3
	Capital Television
	Prime Television
	WIN Television
	Prime Television
	WIN Television

Northern New South Wales and Queensland

MEDIA TYPE	COMPANY
NEWSPAPERS	The Armidale Express
	The New Englander
	North Coast Advocate
	Bellingen Courier Sun
	Byron Shire Echo
	Byron Shire News
	Richmond River Express Examiner
	Don Dorrigo Gazette
	Glen Innes Examiner
	Namoi Valley Independent
	North West Magazine
	Inverell Times
	Northern Rivers Echo
	Northern Star
	Moree Champion
	The Courier
	Country Leader
	Northern Daily Leader
	Tamworth City Times
	Tenterfield Star
	Courier Mail
	Sunday Mail

	Whitsunday Times
	The Tablelander
	The Tablelands Advertiser
	The Advocate
	Bowen Independent
	Beaudesert Times
	Cairns Post
	Cairns Sun
	Western Times
	Chinchilla News
	Daily News
	Gold Coast Bulletin
	Gold Coast Mail
	Gold Coast Sun
	Goldcoaster
	Hinterland Sun
	Robina Sun
	Twin Towns Coaster
	Goondiwindi Argus
	Home Hill Observer
	Herbert River Express
	Innisfail Advocate
	The Ipswich Advertiser
	Queensland Times
	Southsider
	The Reporter Newspaper
	The Daily Mercury
	The Mackay Midweek
	Miners Midweek
	Pioneer News
	Stanthorpe Border Post
	The Chronicle
	The Advertiser
	North Queensland Register
	Townsville Bulletin
	Townsville Independent News
	Daily News
RADIO	Radio 2CS
	Radio 2GF
	Radio 2MG
	Radio 2MO
	Radio 2NR

	Radio 2NU
	Radio 2NZ
	Radio 2UM
	Radio 97
	Radio 2LM
	Radio 2NOW FM
	Radio 2ZZZ FM
	Radio 4BC
	Radio 4KQ
	Radio 4QR
	Radio 4BH
	BIO5 FM
	QFM 106.9
	Triple M
	101 FM
	4ZZZ FM
	Radio 4AM
	Radio 4CA
	Radio 4GR
	Radio 4HI
	Radio 4MK
	Radio 4QS
	Radio 4TO
	Radio 4WK
	ABC Radio Far North
	ABC Regional Production Unit
	Double R
	Radio 4QN
	ABC Radio Tropical North
	HOT FM Cairns
	HOT FM Mackay
	HOT FM Townsville
	Sun 87.6
TELEVISION	ABT Q
	Sunshine Television
	Sunshine Television – Mackay
	Sunshine Television – Toowoomba
	Sunshine Television – Townsville
	Ten Queensland

	WIN Television
Tasmania	
MEDIA TYPE	COMPANY
NEWSPAPERS	Bay-City Star
	Community Express
	The Mercury
	Sunday Tasmanian
	The Examiner
RADIO	7BU
	7NT
	7SD
	7TAB
	7ZR
	TTT-FM
	HO-FM
TELEVISION	ABT2/ABNT3
	TNT9
	WIN Television

Victoria

MEDIA TYPE	COMPANY
NEWSPAPERS	The Age
	The Herald Sun
	Sunday Age
	Sunday Herald Sun
	Ararat Advertiser
	Ballarat Courier
	Ballarat News
	Pyrenees Advocate
	Camperdown Chronicle
	Casterton News
	Colac Herald
	Buloke Times
	West Wimmera Advocate
	Hamilton Spectator
	Hopetown Courier
	Wimmera Mail Times
	Kaniva Times
	The Rainbow Argus

RADIO	3AW
	3LO
	3XY
	Magic 693
	Radio National
	3FOX FM
	Triple M
	3CR
	3BA
	3HA
	3WM
	3WV
	3YB
	ABC Regional Production Unit
	3WL
TELEVISION	Prime Television
	WIN Television

Northern Territory

MEDIA TYPE	COMPANY
TELEVISION	ABD6
	NTD8
RADIO	8DDD FM
	ABC Territory Radio
	HOT 100 FM
	Radio National
	Radio TOP FM
NEWSPAPERS	Centralian Advocate
	The Suburban
	Northern Territory News
	Tennant & District Times



WORKSHOP AGENDA

ORGANOCHLORINE PESTICIDES MANAGEMENT PLAN

9.30 am	Welcome and Introduction	
9.45 am	Handling, Storage and Transport	
	<i>Management Plan</i>	<i>Section 7</i>
	<i>Management Plan</i>	<i>Sections 8.1 to 8.5</i>
	<i>Management Plan</i>	<i>Sections 4.1 to 4.3</i>
	<i>Discussion Paper</i>	<i>Sections 4.3.1, 4.3.2 & 4.4</i>
		“OCP waste, storage, handling and transport”
		“Destruction of scheduled OCP waste”
		“OCP sampling and analysis”
		“Storage”, “handling” & “transport”
	Destruction Technologies	
	<i>Management Plan</i>	<i>Sections 8.6 to 8.15</i>
	<i>Discussion Paper</i>	<i>Section 4.5</i>
		“Destruction of scheduled OCP waste”
		“Management (including destruction) of consolidated wastes”
10.45 am	MORNING TEA	
11 am to 12.30 pm	Communication, Consultation and Education	
	<i>Management Plan</i>	<i>Section 12</i>
		“Community participation, education and training”
	<i>Management Plan</i>	<i>Section 7.4</i>
	<i>Discussion Paper</i>	<i>Section 4.2.4</i>
		“OCP waste, storage, handling and transport”
		“Promotion and education”
	Public Reporting & Accountability	
	<i>Management Plan</i>	<i>Section 5</i>
	<i>Management Plan</i>	<i>Section 10</i>
	<i>Management Plan</i>	<i>Section 11</i>
	<i>Management Plan</i>	<i>Section 13</i>
	<i>Discussion Paper</i>	<i>Section 4.6</i>
		“Notifiable quantity”
		“Monitoring”
		“Certification”
		“Review”
		“Public reporting and accountability”
	Scope, Contaminated Soil, Landfill	
	<i>Management Plan</i>	<i>Sections 2, 6 and 9</i>
12.30 pm	LUNCH	
1.30-3.00 pm	Implementation of the Management Plan at the Local/Regional Level	
	<i>Management Plan</i>	<i>Section 3</i>
		“Collections”
	Discussion of how the Management Plan could best be practically implemented at the local/regional level drawing upon the knowledge/skills of workshop participants.	
3.00 pm	AFTERNOON TEA	
3.15-4.00 pm	Possible National Collection Options	

4.00-4.20 pm General Discussions

Finalise discussions and define clear outcomes

4.20-4.30 pm Summing Up - Where to from here?

Jones, Heather	Country Women's Association of WA	Grygorcewicz, Czes	Senior Scientist – Occupational Hygiene, SA Department for Industrial Affairs
Keamy, David	Nufarm Ltd		
Lethlean-Baxter, Christine	Delegate for Rural Women, Country Women's Asscn of WA	Harvey, Max	Director Recycling & Waste, SA Environment Protection Authority
Meney, Pat	Farmer	Jesse, David	Assessor, Agsafe
Meney, Rob	Vice President, WA Farmers Federation	Lewis, Rod	Chairman, Strawberries Australia
Rutherford, Peter	Chemicals Coordinator, Agriculture WA	Lincoln, Barry	
Thomas, Geoff	State Secretary, Crop Sprayers Asscn of WA	Marshall, Tim	Co-ordinator, Local Government Component, Mt Lofty Ranges Catchment Program
Townrow, Julie			Environmental Health Officer, City of Happy Valley, Noarlunga, Willunga
Townrow, Mike			
Townrow, Scott	Spray contractor	Murrum, Barbara	
Wahlsten, Peter	WA Farmers Federation		
HAHNDORF			
		Nicholls, Andrew	
Andre, John	Chairman, SA Cattlecare Committee	Nixon, Edward	Business Advisor, Fleurieu Regional Development Board
Anthony, Trevor			
Attwood, Elaine	Consumers' Assn of SA	Penhall, Mike	Environmental & Community Services Officer, Southern Mallee District Council
Bishop, Bill	Chairman – Cherry Growers of SA, SA Farmers Federation		
Brenton, Michelle	Horticulturist, Boral Resources (SA) Ltd	Philp, Peter	Southern Regional Sales Manager – Agrevo Pty Ltd/Technical Committee Chairperson, Australian Environmental Pest Managers
Britton, Ross	Extension Officer, Primary Industries SA		
Collins, Des	Water Resource Officer – Mt Lofty Catchment Program, SA Dept Environment & Natural Resources	Pitcher, Colin	Cleanaway
		Ranford, Trevor	General Manager, Apple & Pear Growers Association of SA Inc
Dainis, Ivan	Executive Officer, Special Projects, Office for the Commissioner for Public Employment	Robertson, Roger	Environmental Health Officer, District Council Mt Barker
Daly, Colin	OHS Consultant, WorkCover	Sas, Alex	Viticulturist, Australian Wine Research Institute
Dougherty, Gavin	Hazardous Substances Officer, SA Metropolitan Fire Service	Schulz, Brigitte	Environmental Plan Co-ordinator, City of Playford
Doyle, Irene	SA Country Women's Association	Sclare, Geoff	Senior Adviser – Hazardous Waste, SA Environment Protection Authority
East, Rod	Regional Manager, Rhone Poulenc Rural/Avcare	Smith, Alec	CASANZ

Standfield, Jeff	Scientific Officer, Dangerous Substances Branch, SA Dept for Industrial Affairs	Hernando, Dr Richard A.	District Veterinarian, Walgett Rural Lands Protection Board
Stephens, Graham	Inspector, SA Dept for Industrial Affairs	Hodges, Mark	Environmental Health Officer, Narromine Shire Council
Teakle, Trevor	Senior Environmental Health Officer, Adelaide Hills Council	Howarth, John	Councillor, Evans Shire Council
Thiele, Andrew	Environment Officer, SA Employers' Chamber of Commerce and Industry	Hughes, David	Area Manager, NSW Farmers
Walker, David	Project Manager – Chemical Management, Primary Industries SA	Lax, Dr Alan	District Vet, RLPB Dubbo
		Markwick, Greg	Regional Director of Agriculture, NSW Agriculture
		McDonald, Angus	Pesticides Inspector, NSW EPA
DUBBO		McGrane, Anthony	Mayor, Dubbo City Council
Allen, Warren	Manager Health and Building Services, Wellington Council	Moore, Pamela	Past State Secretary, Country Women's Association
Barwell, Bob	National Coordinator, Cattlecare & Flockcare	Palmer, Philip	Australian Plague Locust Commission representative, Warren Shire Council/Dubbo Rural Lands Protection Board
Beard, Dr John	Lecturer Environmental Chemistry, Environmental Studies Unit, CSU- Mitchell	Quigley OAM, Jessie	State Executive, Country Women's Association
Cormie, Trent	Manager Health, Building & Environment, Coonabarabran Shire Council	Rowland, Philippa	Bureau of Resource Sciences
Crane, Brian	Manager Health & Development Services, Warren Shire Council	Sims, Colin	Warehouse & Distribution Coordinator – NSW, Nufarm
Davis, John	Manager Environment and Health, Dubbo City Council	Sullivan, Geoff	Environmental Health Officer, North Coast Public Health Unit (on secondment to Centre for Population Health)
Davis, Wayne	Manager Health Services, Orange City Council	Toffolon, Roger	Program Leader, Ag & Vet Chemicals, NSW Agriculture
Diggs, Ivan	Dangerous Goods Officer, United Transport Services	Walton, Ted	Dubbo Field Naturalists Society
Dunn, Cormack	District Co-ordinator, WorkCover (NSW)	Webster, Marion	Councillor, Evans Shire
Gorta, Mark	Manager Chemical Policy, NSW EPA	Wroth, Robert	District Veterinarian, Rural Lands Protection Board
Handsaker, Paul	Gunnedah Pesticide Liaison Committee (Avcare)		

CANBERRA

		Marshall, Richard	Landfill Manager, ACT Waste
Arkininstall, Simon	Environmental Officer, Bega Valley Shire Council	Martin, Ron	Development Officer, MIA Council of Horticultural Associations
Bassett, Meredith	Program Officer, Grains Research and Development Corporation	May, Paul	Chairman, South East Integrated Regional Waste Management Steering Committee
Beer, Peter	Director of Environmental Services, Cooma-Monaro Shire	McDowall, Peter	Environment ACT
Blackman, Dr Norm	Managing Director, Blackman Consultancies Pty Ltd	McNamara, Mark	Managing Director, Clough Environment Engineering Pty Ltd
Clay, Steve	Manager Environmental Services, Yarrowlumla Shire Council	Nicholls, Michael	Chairman – Agricultural Chemicals, NSW Farmers' Association
Coleman, Ian	Director, Agvet Chemicals Policy, Department of Primary Industries and Energy	Ormay, Mary	Convenor, North Belconnen Landcare Group
Cowan, John G	Managing Director, Radian International P/L	Russell, Dr Robyn	Principal Research Scientist, CSIRO Entomology
Darby, Mike	Assistant Director – Meat and Livestock, NSW Farmers' Association	Smith, Gary	Environmental Coordinator, Eurobodalla Shire Council
Glen, Stuart	Marketing Manager, ESR	Thomas, Dr Percival	Senior Lecturer, La Trobe University School of Environmental Management & Ecology
Grabosky, Dr Peter	Research Associate, Australian Centre for Environmental Law	Thompson, Keven	Canberra Branch Manager, Collex Waste Management
Hansen, Phil	Emergency Management Officer, Queanbeyan City Council	Thompson, Mike	Manager Environmental Health, Queanbeyan City Council
Heddle, Jenny	ACTA	Thornthwaite, Darrell	District Officer, Procedures Development, ACT Fire Brigade: ACT Emergency Services Bureau
Heiskanen, Leo	Scientific Adviser, Public Health Division (MD103), Dept Health and Family Services	Isabelle Vallin	Director, Conservation Council of the South-East Region and Canberra OH&S
Hillary, Eve	ACTA	Van Cornewal, Roger	Trainer/Consultant, Workwatch OH&S Training
Hodgson, Dr Tony	Manager Chemicals, Air & Noise, Environment ACT	Waterman, Peter	Managing Director, Environmental Management Services Pty Ltd
Holden, Robyn	National Board, Australian Environmental Pest Managers Association		
Inall, David	Policy Officer, Cattle Council of Australia		
Kent, John	Manager, Farmcare Australia Secretariat, Farmcare Australia Farm Chemical User Training Program		

Wilson AO, Gratton Chairman, Southern Area Health Board
 Wong, Peter Managing Director, CWDS P/L

STANTHORPE

Blake, Miles Publicity Officer, P.A.T.C.H.
 Cobon, Scott Director of Health & Building Services, Stanthorpe Shire Council
 Collin, Derek Hydrogeologist, NSW Dept Lands & Water Conservation
 Curran, Philippa Dip Site Project Officer, NSW Agriculture
 Darlington, Craig SW Qld Organiser, Aust Services Union
 Dekeersgieter, Peter Devin, A.J. Director of Works & Tech Services, Boonah Shire Council
 Fraser, Matthew Environmental Health Officer, Stanthorpe Shire Council
 Hasted, John Manager, Eastern Downs Regional Organisation of Councils
 Huinck, Leon Manufacturing Director, Rhone Poulenc Rural
 Ibiebele, Dr Dagogo Manager Waste Management, Qld Dept Environment
 Jacobsen, Preben Qld Fruit & Veg Growers
 Johnston, John Inspector Noxious Plants, Far Nth Coast County Council
 Long, Dennis Cattlemens Union of Australia
 Lynch, L. E. Noxious Plant Inspector, Far North Coast County Council
 Macnamara, Betty
 Macnamara, Cr Ray Works Chairman, Waggamba Shire
 Martin, Bob Manager Environmental Services, Yallaroi Shire Council

Menkins, Ian Librarian, Toowoomba & Region Environment Council (T.R.E.C.) Inc.
 Mitchell, Bob E.H.O., Jondaryan Shire
 Moles, Sarah Co-ordinator, T.R.E.C.
 Murray, Jasen Manager – Environment, South West Power Management Committee Member, T.R.E.C.
 Ondrus, Frank Research Officer, Qld Farmers Fed'n
 Ross, Richard Noxious Weeds Officer, Tenterfield Shire Council
 Rossington, Neil Director, Waste Solutions Australia P/L
 Smith, Paul Chairman, Farmcare Australia
 Smith, Roy QLD Manager, Cleanaway Technical Services
 Straker, Jim Executive Officer, Qld Landcare Council
 Tadman, John
 Thompson, Wayne S.R.S., Jondaryan Shire Council
 Way,
 Williams, John Regional Director North Coast, NSW Agriculture

TOWNSVILLE

Aahlby, Dr Lena Lecturer, James Cook Uni/ North Qld Conservation Council
 Amiet, Peter Field Manager, Mackay Cane Protection Board
 Baker, Jocelyn
 Bolger, Terry Townsville Trade Waste
 Brock, Peter Principal Teacher, Barrier Reef Institute of TAFE
 Chandler, Tony Burdekin Shire Council
 Cupples, James Program Manager, Farmsafe Qld
 Curtis, Rob Senior Environmental Officer, Qld Dept of Environment
 Datson, Joanna Inspector, Qld Dept of Primary Industry
 Davies, Bryce Extension Officer, Bureau of Sugar Experiment Stations

Donovan, Dan	Instructor Crops, Burdekin Agricultural College	Stephensen, Cath	Manager – Horticulture, Barrier Reef Institute of TAFE
Haynes, David	Water Quality Co-ordinator, Great Barrier Reef Marine Park Authority	Stewart, Gregor Taylor, Graeme	Safety Officer, Burdekin Agricultural College
Hoogsteyns, Mark Jenkins, Jeremy	Regional Manager, QCCI Manager Environmental Health & Planning, Hinchinbrook Shire Council	Trenchard-Smith, Dr M. I.	British Society Professions Supplementary to Medicine
Johnson, Barry	Sector Director, Qld Fire and Rescue Authority		
Kooyan, Peter	Burdekin District Cane Growers	HOBART	
Kuhl, Ian	Coordinator Waste Management, Townsville City Council	Adams, Sean	Trade Waste Officer, Launceston City Council
Lloyd, Trevor	Project Manager – Liquid Waste, Brisbane City Council	Baker, David	Waste Management Co-ordinator, Glenorchy City Council
Lyons, Keith McLachlan, Kylie	Invicta CPPB Environmental Health Officer, Bowen Shire Council	Barclay, Jock	Snr Project Officer (Scientific), Tas Dept of Community and Health Services
McLaughlin, Anne	EHO–EPA, Townsville City Council	Blacklow, Scott	Technical Assistant Solid Waste, Hobart City Council
Miles, David	Director Waste Management, Qld Dept of Environment	Brennan, John	Manager – Environment and Safety, Collex Waste Management P/L
Milford, Bernard	Manager – Economic & Technical Systems, Canegrowers	Davis AM, A/Prof Bruce Deprez, Pat	Deputy Director ISAOS, University of Tasmania Senior Hazardous Waste Management Officer, Tas Dept Environment and Land Management (DELM)
Mom, Joan	Australian Chemical Trauma Alliance		
Mullins, F. V. Puddlefoot, Ian Ready, John	Townsville City Council JP & AL Ready Manager, J. Ready Specialist Weed Control Pty Ltd	Doole, Jon	Senior Environmental Health Officer, Kingborough City Council
Rowlinson, Sue	Executive Officer, Canegrowers	Driessen, Jes	Tasmanian Apple & Pear Growers Ass'n
Schultz, Rod	Supervisor, Invicta Cane Protection & Productivity Board	Giddings, Lara	Member, Tasmanian House of Assembly, Shadow Minister for Environment
Searle, Russel Sgarbossa, Paul	Ayr Cane Productivity Board Chairman, Inkerman Cane Protection & Productivity Board	Judson, David	Environmental Health Officer, Clarence City Council
Solinas, Leon	Environmental Services Manager, Charters Towers City Council	Kile, Rohan Lewis, Adrian	Agronomist, Roberts Ltd Indicators Liaison Officer, DELM

Parsley, David	Sen. Scientific Officer, Tas Dept Primary Industry & Fisheries	Neilands, Uldis	Waste & Environment Engineer, City of Ballarat
Paterson, Ruth	Project Officer, Tasmanian Women in Agriculture	Newman, Garry	Environmental Health Officer, Horsham Rural City Council
Phillips, Jocelyn	Communications/ Education Officer, DELM	Pritchard, Felicity	Agronomist, Agriculture Victoria
Rue, Carinda	Senior Environment Officer, DELM	Stebbing, Christopher	Manager, Emergency Containment
Tankard, Murray	Manager, Roberts Ltd	Steere, Richard	Victorian Farmers Federation Agricultural & Veterinary Chemicals Committee
Terry, Chris	Manager, REI Consulting	Stranger, Jim	Regional Chemical Standards Officer, Vic Dept of Natural Resources & Environment
Valentine, Peter	Regional Manager (Hobart), Serve-Ag P/L	Toohy, Les	Dept of Natural Resources & Environment State Representative, Country Women's Association of Vic Inc.
Waight, Stephen	Manager State of the Environment Unit, DELM	Wait, Wendy	
Wilby, Jean V.	Group President, Country Women's Association (Tas)		

HORSHAM

Bonollo, Allan	Environmental Health Officer, Rural City of Ararat
Britt, Tony	Principal Veterinary Officer Chemical Residues, Vic Dept of Natural Resources
Burrow, Bruce	Environmental Health Officer, Northern Grampians Shire
Emmerson, Richard	Rural Consultant, Wesfarmers Dalgety
Hair, Campbell	Horsham Urban Fire Brigade
Handby, Bob	Environmental Health Officer, Moyne Shire Council
Hogan, John	Principal Consultant, Vic Environment Protection Authority
Hogan, Michael	Altona Environmental Action Group
Manley, Ian	Service Director, Yarriambiack Shire
Meaklim, Jean	A/Snr Scientist, Dept of Human Services, Environmental Health Unit

DARWIN

Baker, Ian	
Cahill, Robyn	Executive Officer, NT Branch of the Australian Medical Association Environment Centre NT
Cartling, Carolyn	
Cowden, Janet	
Dyall, Robin	Solicitor, Environmental Defenders' Office (NT)
Fischer, Robert	Assistant Director Dangerous Goods, Work Health Authority
Fuller, Louise	Environment Resource Officer, Local Govt Association of the NT
Gracie, Irene	Public Officer, Country Women's Association of the NT Inc.
Green, Nigel	Environmental Scientist, NT Dept of Lands, Planning and Environment
Halloran, Charlie	Assistant Manager, PCO
Hitchcock, Rob	Secretary, ALHMWU
Johnson, Barry	Principal, Quality Pest and Fumigation Service

Joswig, Caroline	Country Women's Association of the NT
Kelly, Roger	Manager, Far North Pest Control
McCarron, Doug	Chairman – NT, Australian Environmental Pest Managers Association
Nixon, Susan	Work Health and Dangerous Goods Officer, Work Health Authority
Parker, Geraldine	A/Chief Poisons Inspector, Territory Health Services
Philip, Ian	Chief Transport Inspector, NT Dept of Transport and Works
Scott, Alison	Lecturer/Curriculum Developer, School of Horticulture and Landcare Studies, Northern Territory University
Weepers, Jane	Coordinator, Environment Centre NT
Wood, Gerry	President, Litchfield Shire Council

APPENDIX VIII: LIST OF INFORMATION RECEIVED FROM THE COMMUNITY

Name & Organisation	Title of Document
Gina De Pretto, Multicultural Health Promotion Officer, Southern Area Health Services (NSW)	<i>Protocol for consulting with and providing information for non-English speaking background communities, from Different Channels: a research protocol for consulting with and informing rural non-English speaking communities, by Harknah Hamer</i>
Mark Gorta, NSW EPA	<i>Gunnedah pesticide in raintank survey preliminary summary of results</i>
Michael McManus, Primary Industries and Resources SA	<i>Organochlorine information for Environment Australia (on action taken following late 80s OC crisis in SA)</i>
David Walker, Primary Industries SA	<i>Farm Chemicals Survey Mount Lofty Ranges Region, prepared for Primary Industries SA by Harrison Market Research Pty Ltd</i>
Peter Wong, CWDS P/L	<i>Composition of Household Hazardous Waste, 1991/1992 presentation at NSW LGA conference</i>

?? Facilities?

~~/~~

~~/~~

~~/~~

~~/~~

How would you rate the
suitability of the meeting
time?

~~/~~

~~/~~

~~/~~

~~/~~

~~/~~

~~/~~

~~/~~

~~/~~

...../ **over**

Thank you for your assistance. Your input is valued.

APPENDIX X: FEEDBACK FROM THE EVALUATION FORMS

Figure A

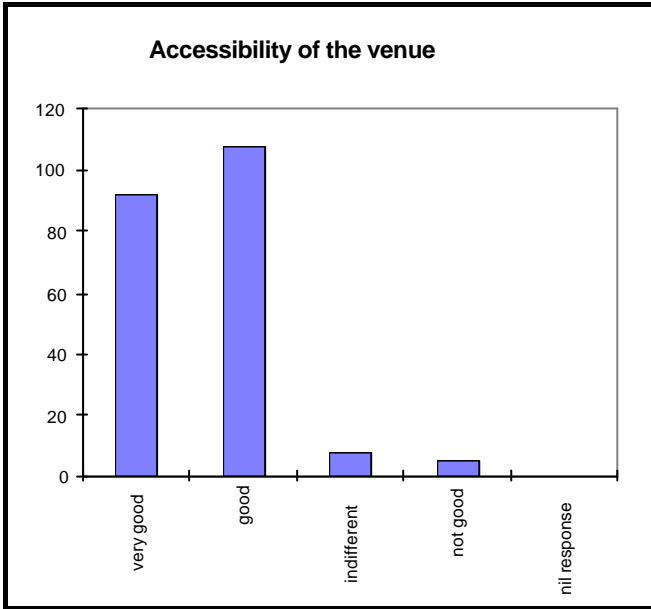


Figure B

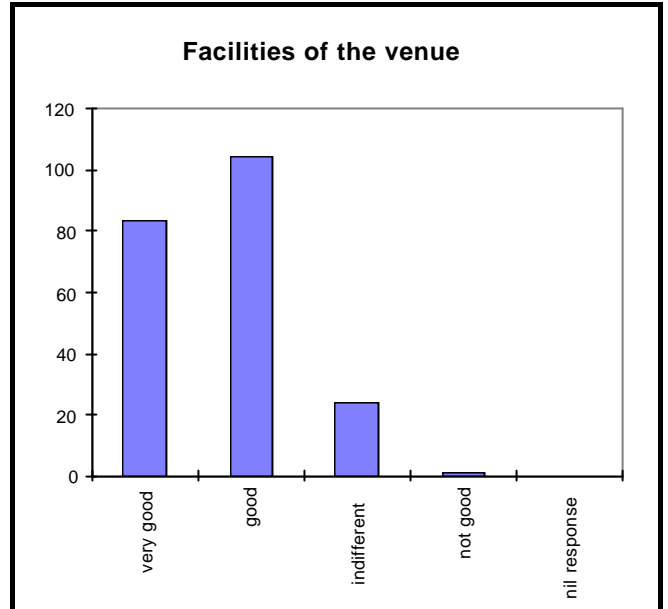


Figure C

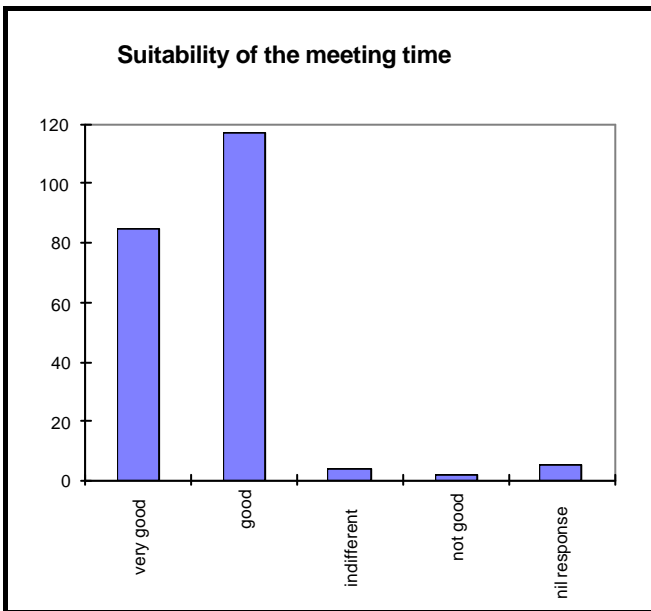


Figure D

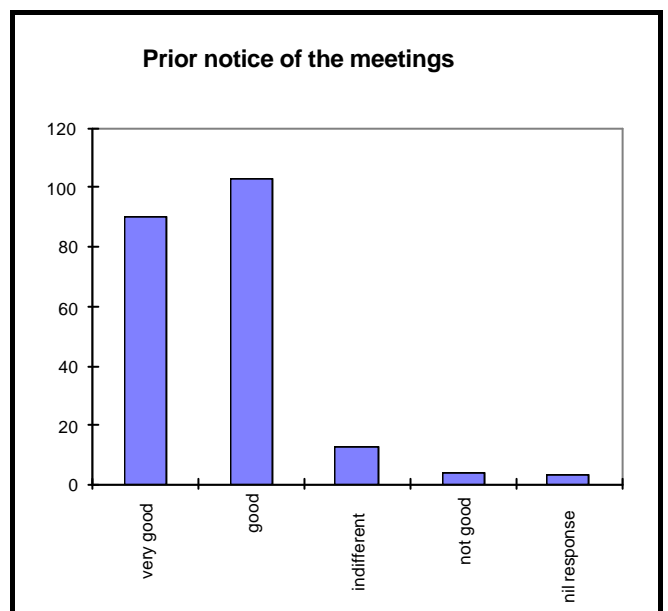


Figure E

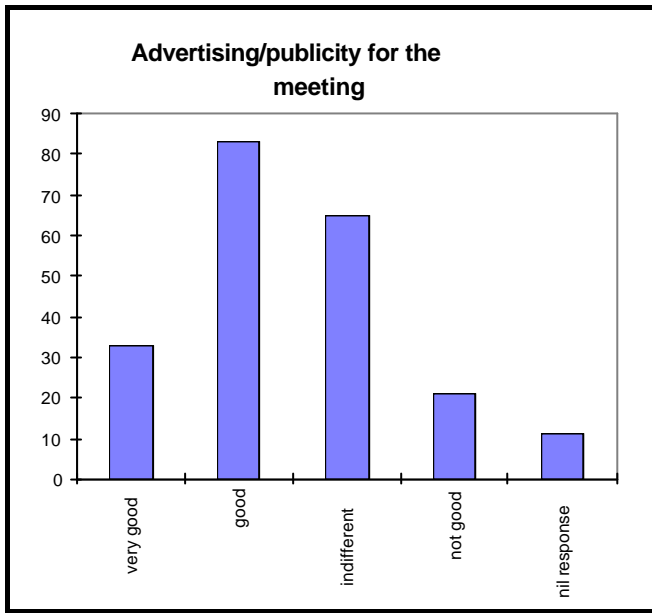


Figure F

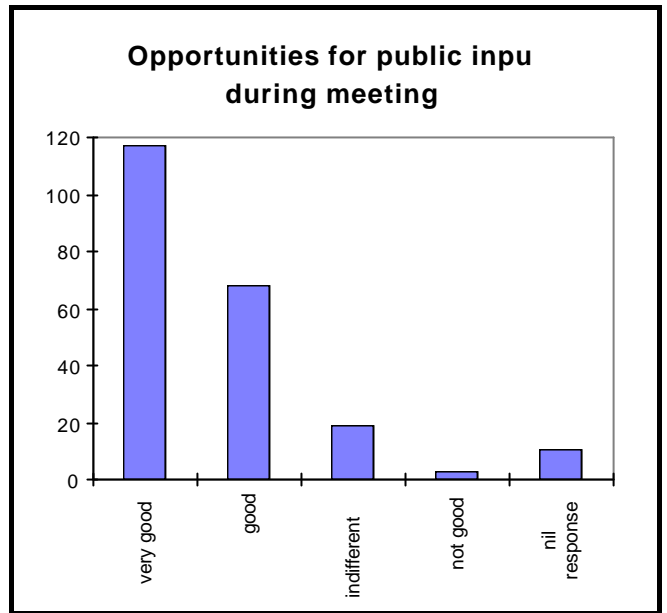


Figure G

