



The Hon Josh Frydenberg MP
Minister for the Environment and Energy
Parliament House
CANBERRA ACT 2600

CC: Mr Paul Kesby
Director, Hazardous Waste Section,
Department of the Environment,
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hwa@environment.gov.au

30 August 2016

RE: ORICA AUSTRALIA'S APPLICATION TO EXPORT
HEXACHLOROBENZENE (HCB) WASTES TO FINLAND FOR INCINERATION

Dear Minister,

We would like to express our strong opposition to Orica's application to export to Finland their HCB waste stockpile for incineration for the following reasons. We also attach our formal objection which further elaborates our concerns.

Australia is a developed country and should deal with its own POPs (persistent organic pollutants) waste as it has in the past. Australia has the technical expertise and

suitable technologies capable of destroying HCB are commercially available. It is possible and feasible to site destruction facilities in Australia. Australia needs a hazardous waste destruction facility that can address the burgeoning amounts of current POPs waste as well as future POPs waste. Newly listed POPs are present in large quantities in Australian building and electronic wastes requiring environmentally sound destruction.

Australia also has an obligation to destroy the waste within national borders, under Basel Convention Article 4 to *"take the appropriate measures to (b) Ensure the availability of adequate disposal facilities, for the environmentally sound management of hazardous wastes and other wastes."*

Transport of such a large amount of toxic POPs waste across the globe is in itself hazardous. While this current permit is only for 135 tonnes, there is approximately 10,000 tonnes that would need to be shipped and transported for incineration. This arrangement with the Ekokem Riihimäki incinerator will address all the HCB waste and large quantities of HCB waste remain in Australia and will still need to be destroyed.

The *Stockholm Convention on Persistent Organic Pollutants* 2001 warns that the incineration of hazardous POPs waste creates more toxic POPs byproducts in the incinerator dust, fly ash, liquid scrubber waste and air emissions. These dioxin contaminated waste residues will need disposal and management into perpetuity and will leave an Australian hazardous waste legacy in Finland.

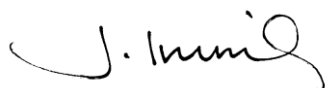
This is the fourth attempt by Orica to ship the toxic waste overseas for burning. Previous attempts to export the waste to Germany, Denmark and then France were rejected after public outrage and community demonstrations. The German, Danish and French governments concluded that Australia has a legal responsibility to manage its own waste and is financially and technically capable of doing so. The exports were rejected and Australia's reputation as a leader in environmental management was seriously impacted.

In 2006, Orica was quoted in the media as saying, "where there is opposition we will not go" (Environmental Manager, No 547, 11 July 2006). There is growing opposition in Finland, both locally and nationally and increasing international concern.

The proposal by Orica to export its highly toxic HCB waste to Finland for incineration is unacceptable and should be rejected. Suitable destruction technologies that can achieve far better environmental outcome than incineration are available and can be established in Australia, thus avoiding all the risks associated with long-range transport of the toxic waste. Australia has an international responsibility to manage its own waste.

We believe that any reasonable assessment of this HCB export proposal must lead to its rejection and we strongly urge the Minister to reject this proposal outright.

Yours sincerely,



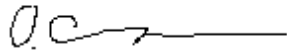
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