

8 August 2018  
ACTU D No: 166/2018

Proper Officer  
NPI Review Steering Committee  
Department of the Environment and Energy

Via email: [NPI@environment.gov.au](mailto:NPI@environment.gov.au)

### Re: Review of the National Pollutant Inventory (NPI)

The Review of the National Pollutant Inventory discussion paper invites comment on a range of usability and technical issues relating as well as any other issues relating to the NPI.<sup>1</sup>

Unions are committed to working towards the reduction in the use of toxic substances at work in order to protect both workers and the community from any harmful effects of chemicals. As such, we support the:

- rigorous assessments of all chemicals, both those currently in use and 'new' chemicals introduced into Australia;
- adoption of a Toxic Use Reduction approach; and
- progressive phase out of International Agency for Research on Cancer (IARC) Group 1, followed by Group 2A carcinogens linked to occupational cancer.

We agree that the level of awareness about the NPI is low in Australia<sup>2</sup> and is in our view one expression of the disjointed regulation of chemicals in Australia. We also note that the Internal Review conducted in 2014 recommended changes to the online reporting system, and we are curious as to why it appears that has not been implemented.

Accurate data is a prerequisite to measurement of any reduction in the toxic load on people and the environment. The collection of data in a system such as the National Pollutant Inventory is essential.

We are concerned that for several substances there has been no reduction in emissions over the last five years. The 93 substances on the NPI include 11 known human carcinogens.<sup>3</sup> According to the last five years of NPI reporting the total emissions of 3 substances have shown a significant decrease, 6 are essentially static and 2 have increased (benzene and formaldehyde). IARC recently upgraded styrene to

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<sup>1</sup> About the NPI review, page 8

<sup>2</sup> Review Paper page 25.

<sup>3</sup> International Agency for Research on Cancer – Cat 1 – arsenic and cpds, benzene, beryllium & cpds, butadiene, cadmium & cpds, Chromium VI, ethylene oxide, formaldehyde, nickel cpds, trichloroethylene and vinyl chloride monomer.

a probable human carcinogen. Styrene emissions did trend down after 2012/13 but are now up higher than the 2012/13 levels.

The Review gives examples of significant reductions in lead, mercury and sulphur dioxide by selected facilities as well as increases in PM10 and PM2.5.

Given the known morbidity and mortality of exposure to carcinogens PM10 and PM2.5, the lack of a downward trend on emissions highlights a flaw in the regulation of chemicals. The current NPI allows for the voluntary reporting of clean production techniques. However, there is no reporting mechanism or obligation for facilities to implement any emission reduction or clean production measures. The adoption of a Toxic Use Reduction approach, where facilities submit their plans for emission reduction has been shown to be very effective.<sup>4</sup>

We support in principle the increased number of substances on the NPI – OCED revised recommendation on PRTR harmonisation.

We call on the Review to recommend:

- the introduction of emission targets for priority chemicals; and
- the introduction of mandatory reporting of planned pollution prevention.

The collection of data is essential to meet the community’s “right to know” however it must be linked to activities which reduce the adverse effects of industrial activity.

We look forward to engaging with the review going forward.

Yours sincerely,



Michael Borowick JP  
Assistant Secretary

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<sup>4</sup> The Toxics Use Reduction Act (TURA) became law in 1989 and was amended in 2006. It requires Massachusetts companies that use large quantities of specific toxic chemicals to evaluate their operations, plan for pollution prevention, and report on the results each year.