

11 August 2010

Dr Matt Gridley
NICNAS
GPO Box 58
SYDNEY NSW 2001



APMF
Australian Paint Manufacturers' Federation Inc.

Dear Dr Gridley

**CONSULTATION ON AMENDMENTS TO THE SCHEDULE OF THE INDUSTRIAL CHEMICALS
(NOTIFICATION AND ASSESSMENT) ACT 1989**

The APMF is the peak industry body for local surface coatings manufacturers' (paint and ink). Our Federation also includes companies that provide inputs such as raw materials into our industry. Our mission is to represent and advance the interests of our members to ensure the sustainability of our local industry.

The purpose of this letter is to express our concern regarding the proposed new data requirement in Part E to the Schedule of Industrial Chemicals (Notification and Assessment) Act 1989, namely to now provide information about the reaction scheme used to manufacture a polymer.

One concern is that this requirement might be interpreted by paint manufacturers' as the need to re-register a latex, if the manufacturing process was changed even slightly. My members do this type of thing all the time in our industry.

Aside from this, many of the polymer resins used to manufacture paints are now imported and are, by definition, LRCC substances. Also, for imported polymers, health risks associated with a polymer's reaction system would surely be of relevance at the point of manufacture. Once the polymer is created, its health risks can be defined around its chemistry and properties.

The overall result could mean a significant increase in costs without a perceived OHSE benefit and, therefore, a very onerous new provision.

The APMF recommends that this new data requirement be removed from the proposed changes.

Yours sincerely

A handwritten signature in black ink that reads "Richard Phillips".

Richard Phillips
Executive Director