



**Australian Council of Trade Unions**  
**Submission 23<sup>rd</sup> June 2006**

**Discussion paper for public comment**

**A NEW MODEL FOR THE EXISTING  
CHEMICALS ASSESSMENT PROGRAM**

**CONTACT**

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## **ACTU Supports the Review**

Although the current system is very thorough in reviewing chemicals it is certainly evident that a review is necessary to ensure the system is more efficient and effective. The ACTU supports the review for the existing chemicals assessment program in the light of providing more safety information for new and existing chemicals and best protecting Australian workers, the public and the environment.

## **ACTU General Comments**

In general, the ACTU supports the proposals and notes NICNASs strong commitment to upgrading the 'existing chemicals assessment program' to be a much more effective and efficient model. The well-presented and clear discussion paper and Melbourne Community Engagement Forum attended by an ACTU representative showed the efforts of NICNAS to engage a wide cross-section of people. The ACTU is sure that this will assist in the development of a good system for all.

## **Specific Comments**

The ACTU has documented more specific comments on some proposals below.

<b>Proposal</b>	<b>Comment</b>
Proposal 1	The ACTU strongly supports the wide array of support material and other measures to improve NICNAS communication methods.
Proposal 2	The ACTU supports more frequent calls for public nominations to enable NICNAS to capture the topical issues and concerns of the public. ACTU would like to note the importance for NICNAS to ensure they act promptly on these nominations and feedback is given back to the public.
Proposal 3	The ACTU sees this proposal as necessary and supports the screening.
Proposal 4	The ACTU supports the screening of the remaining chemicals as proposed.
Proposal 5	The ACTU supports this proposal recommending that NICNAS look at models already developed by international agencies.

Proposal 6	The ACTU strongly supports a nationally co-ordinated system of surveillance, monitoring and post-market reporting for industrial chemicals. It sees that this information would be invaluable in increasing knowledge and awareness, looking at emerging trends and would also lead to best practice. To ensure this system is effective it is necessary for reporting to be mandatory.
Proposal 7	The ACTU sees this process as being necessary to ensure the effective use of NICNAS resources.
Proposal 8	The ACTU supports this proposal.
Proposal 9	The ACTU supports this proposal.
Proposal 10	The ACTU supports amending the legislation to give NICNAS greater powers to gather information so it can more efficiently and effectively carry out its role in chemical assessments for all types of assessments and related processes. Without this NICNASs ability to carry out assessments is unnecessarily limited.
Proposal 11	The ACTU strongly supports this proposal.
Proposal 12	ACTU supports this proposal so NINCAS can more efficiently and effectively carry out their role in chemical assessments.
Proposal 13	The ACTU strongly support this proposal and sees it as necessary to improve the MOUs so sharing of information between jurisdictions is more fluid. ACTU would like to encourage a clearer understanding of agency roles so the assessment of industrial chemicals is more effective, efficient and also achieving desired outcomes.
Proposal 14	The ACTU strongly supports this proposal.
Proposal 15	The ACTU supports NICNAS broadening their information to include international information to enhance awareness and interest of current issues related to chemicals.
Proposal 16	The ACTU supports developing arrangements with other major trading countries.
Proposal 17, 18, 19 & 20	The ACTU strongly supports these proposals.

