

# **SUBMISSION OF COMMENTS:**

NICNAS Existing Chemicals Program Review **April 2006**

- NICNAS *has* to be provided with more funding from the Federal Government.
- In fact, industry funding of NICNAS should be limited to user-pays services. The Federal Government should be the major funds provider for NICNAS. This would eliminate any possible perceived conflict of interests.
- Implement Review's **Proposals 1 – 15**
- Implement Review's **Proposal 16** - with proviso that the bilateral arrangements with major trading partners are only be entered into if those partners have the same minimum chemical assessment standards as Australia; not just because they are a major trading partner.
- Implement Review's **Proposals 17 - 18**
- Implement Review's **Proposal 19** – plus perhaps a 'TICK' system of encouragement for the industry for those chemicals that are deemed safer, in order to encourage the industry to produce safer chemicals.
- NICNAS should also be responsible for making sure that the education of downstream users occurs, such as Local Government Refuse Centre staff, who may often be 'overlooked' in the training of chemical use, handling & proper disposal.
- Implement Review's **Proposal 20**

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