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Existing Chemicals Program Review Website Questionnaire Response

Question 1: I think we need more focus at the end of the process, the effects on the environment and most importantly, the end user. I feel that the EC program deals with manufacturers effectively but does not capture the formulators and users of the respective chemicals. If you don't have legislative control over obtaining usage information (where, how, how much), how can NICNAS achieve its obligations "PROMOTING SAFER CHEMICAL USE". This is a fundamental break in the chain, 'we need to get the message across'.

Question 2: I believe that the new model comprising of Inputs, Processes and Outputs is a significant step in the right direction. The enforcement powers of NICNAS need to be strengthened and widened to make the overarching regulator of chemicals in Australia.

Question 3: Yes, the majority of concerns are addressed. However, I believe Australia needs a simplified chemical regulatory system. At the moment we have an initial battle of consistency at the Federal/State level and a secondary difference at an Interstate level. This makes for significant confusion, delays and financial inefficiencies both for industry and the community. We must also equally share the financial cost of the new model, not just increase Company Registration fees of the existing NICNAS companies; need to also consider ACCORD members, other chemical industry groups, and further support from government.

Question 4: Proposal 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14,15, 16.
Implementation of these initiatives will see improvement in the Inputs and Processes.

Question 5: Proposal 17, 18, 19, 20.
The initiatives here are good but I feel that more information, analysis and detail is required before the proposals can be fully supported.

Question 6: An overall comment: We need to focus in the areas according to the greatest hazard and risk. The current NICNAS scheme captures all chemicals, hazardous and non-hazardous; the New Zealand scheme captures only hazardous chemicals but includes mixtures. Somewhere in the middle is a great system, which when linked up to international test data, gives rise to action and ultimate protection of the environment and workers of this great country.
I commend the staff of NICNAS and related parties for putting together this informative discussion paper and look forward to seeing major improvements in the system, just like what was delivered in the LRRC reforms.