

Table – Specific Comments on Proposals

Proposal	Comments and/or Concerns	Suggestions
1	Supported	DHS supports the communication tools / approaches listed for Proposal 1. In particular, publishing a ' <i>Who's who and what they do?</i> ' guide is a very good idea. This will not only assist the public but also jurisdictional representatives (ie. OHS, Public Health & Environment) and industry representatives.
2	Supported	
3	Supported	
4	Supported	DHS agrees with Worksafe Victoria's recommendation to include sensitisers as CMR hazards due to their sizable OHS impacts. DHS supports the idea of more efficient screening of chemicals on the AICS listing by utilising current international assessment activities. If this option were to progress, it is important that the methodologies used are reviewed and endorsed for application in the Australian context. DHS makes reference to the enHealth Council document – <i>Environmental Health Risk Assessment – Guidelines for Assessing Human Health Risks from Environmental Hazards (2001)</i> .
5	Supported	DHS Public Health supports: <ul style="list-style-type: none"> • The concept of a centralised system for collecting and recording data on the adverse impacts of industrial chemicals • The need to consolidate information in a form that informs future policy decisions around the use of certain chemicals where there is a potential for public exposure. DHS also recognises that Proposal 5 would need further, more detailed examination of current methods in each state for recording adverse events and how these could be consolidated in a way that (a) protects human health and (b) does so in a cost-effective manner.
6	Supported	The proposal has the potential to generate useful data on population exposures to industrial chemicals and offers an avenue for the reporting of public exposures and adverse health events.
7	Supported	

8	Supported	
9	Supported	
10 & 11	Supported in principle	No specific comment
12	Supported	<p>DHS Public Health notes that Worksafe Victoria has a representative on the NICNAS MOU Committee and is informed by this representative whenever potential issues relating to Public Health arise. The who's who guide will further assist this aspect <i>[refer to comments above for Proposal 1]</i>.</p> <p>A similar process already exists for APVMA-related activities where a DPI Chemical Standards Branch representative co-ordinates whole of Victorian government feedback to APVMA. DHS, EPA Victoria and Worksafe Victoria are parties in this process.</p> <p>This NICNAS ECP reform process is on the agenda of the Product Safety and Integrity Committee of which DHS Public Health is a member. This is an example of another pathway for feedback/consultation mechanisms from a Victorian public health perspective to the national policy context.</p>
13	Supported	
14	Supported	Refer to comments made for Proposal 4.
15	Supported	
16	Supported.	
17	Supported	
18, 19 and 20	No comment at this stage	<p>DHS Public Health notes Worksafe Victoria's comments that:</p> <ul style="list-style-type: none"> This proposal is of a very prescriptive nature and so is incompatible with the general philosophy of performance-based legislation, and it is not clear what is meant by "high hazard/high risk". <p>In relation to these 3 Proposals, DHS would need to see more detail around these options (ie. Regulatory Impact Statement or equivalent, clearly explaining and balancing the costs and benefits of any changes) prior to making comment.</p>