



# Environment House

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## NICNAS Existing Chemicals Program Review June 2006

Our community group welcomes this opportunity for input and advocates the following significant enhancements of NICNAS's authority and operation:

### 1) POWER TO BAN SOME CHEMICALS

**We support Proposal 18, giving NICNAS the power to ban certain high hazard/high risk industrial chemicals.**

a) **Shortcut needed for chemical safety:** Due to the huge number of untested chemicals in use in Australia, we strongly urge that a safety shortcut process be adopted whereby chemicals banned in other nations or states should be banned in Australia unless manufacturers/suppliers of these banned chemicals can demonstrate to the satisfaction of NICNAS assessors that the grounds for the overseas ban were faulty.

#### b) **Safer alternatives should indicate that dangerous chemicals can be banned**

If there is a safer alternative for the purpose available at not unreasonably greater cost, no product containing harmful chemicals should be sold if careful interpretation of complex instructions, or specialised ventilation or personal protective equipment is needed to prevent harmful health or environmental effects.

c) **Priority for this process** In the lengthy process of implementing these controls, our community group urges that chemicals known to be entering breastmilk or crossing the placenta should be given priority against overseas banned products lists and taken off the market.

### 2) SAFETY RATING LABELLING

Those chemicals to be still allowed for use in Australia (ie not banned because not banned elsewhere) should still be tested and rated similarly to energy and water efficiency: those items tested should be labelled with:

a) **ticks** and text such as **'Safe for health and environment if used as directed'** and if applicable 'but not for pregnant women or babies')

b) **crosses** for negative impacts and text such as **"This product contains chemicals that could harm your health."**

Obviously there will be thousands of products needing testing that will therefore bear no such label, but consumers could be encouraged to look for the 'safe' label. This needs to be used on labelling of chemical products together with existing labelling requirements such as "Hazardous according to WorkSafe Australia" or Dangerous Goods labels, as applicable. *Those labels do not sufficiently highlight related hazard details & there is no requirement to provide more details (Material Safety Data Sheets, MSDS) or training on use if the substance is used outside a workplace (except for Scheduled Poison, Ag/Vet chemical or explosive) (We support Proposal 20.)*

### 3) SCREENING AND SURVEILLANCE OF AICS CHEMICALS

Improved health monitoring, assessment and analysis of reported chemical exposure incidents/National Coroner's database is needed. Epidemiological studies require too many people or sections of ecosystems to have 'paid the price' before scientific, statistically valid evidence is available. The precautionary principle should apply. **(i.e. We support Proposals, 2-6).**

#### **4) COLLABORATION**

NICNAS should work collaboratively with other (international) government and non-government agencies to share health monitoring and exposure/assessment information. **(Support for Proposal 15-16)**

#### **5) TRANSPARENCY**

Increased transparency on the role of various agencies in chemical regulation is vital, along with reporting on their key performance criteria. (Are they working to reduce the scale and negative health/environmental effects of chemical usage in Australia?). **(Support for Proposal 13)**

#### **6) SCRUTINY AND ENFORCEMENT OF LABELLING FROM ‘SHIP TO SHOP.’**

There is substantial import of chemicals into Australia, much of which appears to be poorly labelled and goes into products manufactured in Australia. A member of our committee who is a chemical engineer has observed chemical goods sitting at ports and warehouses with limited or no English labelling. She sees it as urgent that imported chemicals and accompanying information are rigorously scrutinised. We are concerned that the smaller scale importer/Australian manufacturer may have inadequate awareness of the chemicals involved. Many discount shops sell cleaning chemicals labelled almost completely in languages other than English, and tend not to have any English listings of chemical ingredients or safe use information. Clear, English product labelling should be mandatory in Australia at all stages of the supply chain from **ship to shop**.

#### **7) Comprehensive listing of ingredients in proportional order**

The chemicals in cleaning products and personal care currently do not have to be comprehensively listed. Rather, only the active ingredients must be listed. As some people may have reactions to the so-called ‘non-active’ background ingredients, these should also be listed.

#### **8) Improved communication with stakeholders to capture their concerns**

Stakeholders need to have ready access to better background and topical information on chemical safety. With the fragmentation of chemical regulation across a number of agencies, and anecdotal evidence on health and environmental impacts of chemicals, it seems that people are taking chemical risks, mostly through ignorance. Navigation of chemical safety requirements for concerned but uneducated people is very challenging, and given the potential negative impacts on wellbeing, this complexity is a major shortfall in government serving the needs of society. **(Proposal 1 is supported.)**