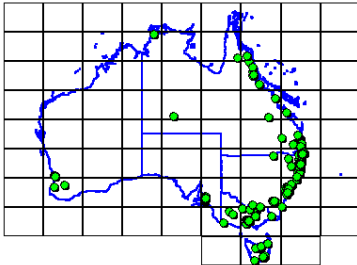


NATIONAL TOXICS NETWORK



NATIONAL TOXICS NETWORK INC.

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NICNAS Existing Chemicals Review Steering Committee
GPO Box 58
SYDNEY NSW 2001

Dear Committee Members,

The National Toxics Network Inc. (NTN) is a NGO network working to promote environmental health, pollution reduction, environmental justice and a toxic free future locally, regionally and globally. NTN provides a national and regional voice on national and international toxic and environmental health issues, with a particular focus on vulnerable communities and children's environmental health.

We have key concerns with the current NICNAS scheme and consider that these must be addressed through reforms to the review of the Existing Chemicals Program.

In summary, these concerns are:

- Only a very small number of chemicals have ever been assessed;
- NICNAS does not have adequate powers to ban, phase-out or restrict chemical use;
- NICNAS has limited powers to gather data on chemicals;
- NICNAS is limited by legislation in the range of assessments they can carry out;
- there is a lack of transparency in internal processes;
- there are very poor feedback mechanisms to collect important information on chemicals in use;
- uptake of NICNAS recommendations is inadequate; and
- policy and programs are reactionary, not proactive.

While other countries are moving to strengthen their chemical review programs to provide better protection of human health and the environment, it is important that the following issues are addressed to improve the strength of the NICNAS scheme. We consider that it is essential that NICNAS;

- focuses on specialised issues, such as susceptible populations and newly recognised health and environmental effects;
- introduces new ways to prioritise chemicals and identify chemicals that warrant risk assessment;
- finds more effective ways to obtain information on volume, use and exposure to chemicals and makes this information public; and
- coordinates surveillance systems for monitoring and post-market reporting for chemicals.

Civil society is growing increasingly concerned about the lack of chemical assessments and the serious impacts that industrial chemicals are having on the planet and on future generations. Persistent and bioaccumulative toxins should not be permitted to contaminate wildlife, humans and in particular newborns and children.

The Precautionary Principle must underpin NICNAS assessments and be applied to all chemical regulation in Australia. As such, NICNAS must have legislative powers to ban, phase-out and restrict hazardous chemicals. To effectively regulate and manage industrial chemicals, it is essential that a national chemical surveillance system is implemented to collect information on the impacts of chemicals on health and the environment. This should be linked to other monitoring systems (eg cancer surveillance systems, body burden monitoring) to ensure the impacts of chemicals are properly identified.

NICNAS must have enhanced legislative powers to gather information for all types of chemical assessments. There is currently no effective cross-referencing with other agencies monitoring chemicals in the environment or public health.

Down stream users of chemicals must be identified and registered. It is vital for effective chemical management to track how chemicals are being used and disposed of and by whom. NTN is regularly approached by workers including transport workers describing disposal and work practices involving industrial chemicals that are unsafe and highly inappropriate.

We hope these points will assist in your deliberations.

Yours Sincerely

Jo Immig
NTN National Coordinator