

Nick Pastalatzis

2/7/06

Dear Sir/Madam,

I would like to make some comments about the NICNAS Existing Chemical Program Reviews discussion paper "Promoting safer chemical use: towards better regulation of chemicals in Australia".

I do understand the submissions have closed but I would like my comments taken into account when there are further opportunities for consultation.

The first issue that I want to bring up is the transportation of chemicals. What concerns me in particular is the way they are transported. My concerns include drivers forced to drive excessive hours beyond legal limits and pressured to take drugs so they can drive longer hours. There is enough people getting killed and injured on the roads already. There is no need to add to this.

The second issue is also based around transportation of chemicals. The issue of concern is the vehicles of which the chemicals are transported in. As of 2007-2008 the (Euro 4) emissions standard for vehicles is coming into force. Will this be looked at in this current review or will it be looked in future opportunities for public consultation. It may need to be passed on to non-NICNAS agencies. The reason for this is to have the vehicles, which transport the chemicals around, be the lowest emissions emitting possible.

The third issue that I want to bring up is the greater use of overseas assessments. On page 25 it mentions that "NICNAS currently participates in two major international assessment programs". Is there any scope to monitor overseas production of chemicals? What concerns me the most is people getting paid a living wage. In particular third world countries, if the people must be getting at least \$2US a day. The United Nations has released the millennium development goals; these goals must be incorporated into these programs as much as possible. That will require MOU'S with other organisations. As someone who is an end user of chemicals, the fact that there is the least amount of exploitation possible, makes me feel good.

Yours Sincerely

Nick Pastalatzis