

From: Neale Jackson
Sent: Thursday, 1 June 2006 8:36 AM
To: Cc:
Subject: Review of PEC program

Hi Margaret,

Unfortunately due to events beyond my control I am unable to attend tonight's consultation forum for your proposed model for the Pre Existing Chemicals Program here in Melbourne. I have however reviewed your proposals and I have some comments to make.

1) It has taken over three years to get this far and I suspect another two years at least to properly make the changes that you suggest for NICNAS in terms of legislation and introduction of change processes for the PEC program. I conservatively estimate that will mean five years since the original evaluation data for PEC uptake was given to NICNAS by RMIT.

I suggest this is a very long time line for change on these important issues of industrial chemicals which are an ongoing concern for workers on a day to day basis.

2) I believe the consultative processes you propose, legislative changes, improvements in communication of PEC recommendations, international focus/collaboration and streamlining of NICNAS activities are appropriate and will certainly lead to improvements if implemented in a proactive manner. I do not believe they will work if you have a reactive attitude, which has happened in the past.

In terms of proactivity I believe that you need to more heavily focus to find out the problems/concerns of industrial chemical use rather than let someone come and tell you about them. In other words you should go out from your office to industry/community sites to speak to people rather than let them come to you. That does not mean just forming a committee to discuss it but for you to actually send your staff to industrial/community sites to observe and be involved with the problems themselves before they start to assess PEC's or to write reports on PEC's.

NICNAS is regarded by many as an ivory tower and this perception has to be changed through your actions (not just words and written documents).

Instead NICNAS needs to become a kick-ass proactive responsive Agency.

NICNAS should be the lead agency in Industrial Chemicals regulation in

Australia and should be respected as such and have the profile within industry and the community to be recognised as such. This will not happen unless you take a new approach.

Neale

Thanks and Regards,

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