



Your ref:

Our ref:

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NICNAS Existing Chemical Program Review  
GPO Box 58  
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### DISCUSSION PAPER – PROMOTING SAFER CHEMICAL USE – APRIL 2006

The table below contains specific comments on the above.

As a general comment, and partial rider to the comments below, I note that several of the proposals could raise community expectations of NICNAS and/or would require considerable additional resources to be implemented. The review itself has probably already raised expectations among some stakeholders. It is therefore critical that when the review is complete, the extent to which NICNAS will implement the final recommended changes, within its resource capacity, is properly communicated.

Proposal	Comment
1	Supported, noting that the details of what would happen are yet to be determined and would be designed to fit the circumstances.
2	It was noted in the review that the list of chemicals requiring review already exceeds NICNAS's ability to process. In that context, more frequent call will most likely only lengthen the list further. Furthermore, formal calls are of themselves labour-intensive exercises. It is also noted that nominations may be made at any time. I would therefore support more frequent calls than at present, but would suggest a fixed frequency of four-yearly.
3, 4, 5	Supported as a combined priority-setting process.
6	Supported in principle, but this idea would need careful design and be subject to proper cost-benefit analysis to ensure that information was worth collecting and contributed usefully to well defined objectives.
7	Supported.
8	Supported. It is important that community stakeholders understand and accept that NICNAS assessments are done using objective scientific and risk assessment principles, and are not social acceptability assessments.
9	Supported.
10	Supported with some reservations. See note to Proposal 6.
11	Supported.
12	Supported.

<b>Proposal</b>	<b>Comment</b>
13	Strongly supported. This is a critical area of communication that has not functioned at all well in WA.
14	Supported.
15	Supported.
16	Supported.
17	Supported, but this approach should not be confined at this stage to the three options listed.
18	Strongly supported. This proposal matches recommendations from the EPHC Chemicals Working Group.
19	As for proposal 18.
20	Supported, noting that greater input from implementing regulatory agencies is required to ensure that NICNAS recommendations are reasonable, practical, and consistent with the risk-based controls imposed through other regulatory approaches.

Yours sincerely

Philip Hine  
Manager Environmental Regulation

17 May 2006