

Abbey Archery

25 October 2011

We are in complete agreement with the proposed changes to the License Fee structure as it makes it more viable for small business to be licensed to import chemicals.

We have a concern as a small business that does register for NICNAS and abide by the rules and pay our NICNAS license making our trade of adhesives 100% ethical and legitimate

One may think that complaining about the registration and fee is petty but this is not where our complaint lies. Our complaint lies in the enforcement of obtaining a NICNAS registration if a business wishes to import chemicals. We have many competitors who import adhesives and solvents with intent of re-sale and wholesale who do not obtain a NICNAS registration. These companies are able to sell at the same price as us, some even sell for less and they do not incur the annual fee of NICNAS registration. The companies that are doing this face no repercussions and it is not enforced that they pay the annual NICNAS License fee.

We are frustrated that there is no enforcement of and or no repercussions for not obtaining a NICNAS registration.

What action does NICNAS take or intend to take in regard to ensuring all Importers of Chemicals are licenced.

With regards,

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