

Stakeholder Feedback

Cost Recovery Impact Statement (CRIS)

The first point I would make is why this scheme requires full cost recovery. It was 'decided' in 1997 to implement full cost recovery, but nothing is said about the process of deciding which Government Services are provided from the public purse and which should be categorised as full or half cost recovery. I suspect chemicals are quite prolific in everyday life, and could probably be put in the same category as quite a number of Government monitoring or inspection agencies.

Another issue of concern is the method of determining the scale of fees and the benefit associated with the fee structure.

I, for instance, pay an annual fee of \$1,577 from which I receive no benefit whatsoever. I should add I don't like contributing to funds "for the greater good of the nation". Firstly, because the Government is responsible for the "greater good", secondly, I am a responsible Australian importer who researches the bone fides of my suppliers. Both my suppliers from which I import "chemicals" have international reputations to maintain and, in fact, export to the USA, where the restrictions are much more rigorous than Australia.

Accordingly, I would request that the criteria used to determine the requirement for NICNAS registration be *revised??*. Perhaps the companies with obvious practices and procedures should be paying the brunt of the fees.

Also related to fees, there is a *disconnect* in the way the fees are calculated. I, for instance, import candles, which are 98% paraffin wax and 2% chemical additives. Therefore, in a \$10 candle, I am importing \$0.20c worth of chemicals. An importer of chemicals would bring in a \$10 container of pure chemicals, yet his fees are the same.