



## LRCC evaluation update: draft report for public comment

The first phase of NICNAS's Low Regulatory Concern Chemicals (LRCC) evaluation project is nearing completion, with a draft report of the evaluation findings available for public comment in July 2009. The draft report will be available on the NICNAS website and instructions for how to provide comment to Campbell Research – an independent consultant commissioned by NICNAS – will also be provided.

The feedback received will then be incorporated into the final report.

The draft report, prepared by Campbell Research, details the findings from the evaluation of the industry response to the following LRCC reform initiatives which were implemented in 2004:

- Audited self-assessment of polymers of low concern and non-hazardous chemicals
- Increased exemptions for low volume, trans-shipment, cosmetic, research and development/analytical chemicals
- Administrative renewals for Low Volume Chemical and Commercial Evaluation permits
- Mandatory registration for Tier 1 companies
- Improved access to chemical safety information, including Australian Inventory of Chemical Substances (AICS) online, and
- Option for early listing of notified chemicals on the AICS.

NICNAS thanks all those who gave feedback during the initial stakeholder consultation, the case studies or the online survey.

The level of participation from was very good, ensuring that the evaluation findings will be useful in considering future improvements to these LRCC initiatives. ■



For more information, please contact [Dr Sarah Rumble](#) on 02 8577 8832



### NICNAS staff members

Phillip Sharp, Mark Horsham, Nobheetha Jayasekara, Sami Syed, Usha Garg and Trang Pham donned special safety suits for a recent site visit!

→ [page 4](#) for details.

ISSN 1444-1209

also  
in  
this  
issue

- 2 **A word from our Director**
- 3 **QSAR training in Bulgaria**
- 4 **Site visits; Handbook; eChemPortal; Quiz etc**
- 5 **Welcome to new Parliamentary Secretary; Multiple Chemical Sensitivity update**
- 6 **Community Engagement Forum; Info sessions update**
- 7 **Existing Chemicals review – progress report**
- 8 **Draft guidance and forms: modular assessment options for new chemicals notifications; New info sheets and assessments on three chemicals**
- 9 **NICNAS staff awards round-up**



a word  
from the  
director ...



Dr Marion Healy

Over the past several years, NICNAS has been gradually strengthening outreach mechanisms to disseminate information as well as to obtain your feedback and input, recognising the importance of two-way engagement with those interested in, and affected by, our activities. NICNAS has traditionally used a variety of communication channels, including publication of newsletters, various information sheets, the *Handbook for Notifiers* and the *Chemical Gazette*, posting material to the website, conference presentations and training for registrants. These have proven to be effective mechanisms with the *Chemical Gazette* reaching around 5,000 registrants, regular attendance at NICNAS training sessions with positive evaluation of the sessions, extensive use of the website with the number of hits for the year approaching 30 million and consistent positive feedback on the availability of website material in the annual customer service charter survey.

Over the past 18 months, we have been focusing particularly on establishing some additional mechanisms for disseminating information and providing information in different formats for different audiences. For regular notifiers of new chemicals, we have been offering updates and specialised training on changes to the notification and assessment arrangements, including trialling training sessions in conjunction with relevant conferences. For industry stakeholders more generally, we have established the Industry Engagement Group as a mechanism for two way exchange of views and – as reported in this edition of *NICNAS Matters* – we have started work on revising the *Handbook for Notifiers* to improve its utility. For all stakeholders, we have been trialling the use of information and fact sheets that aim to present the findings of our scientific work in a plain English format to facilitate broader understanding and use of the findings from our work.

NICNAS also has used a number of mechanisms to elicit input and feedback into our activities. In addition to three ongoing committees, one of the long standing approaches has been the use of multi-stakeholder committees for major activities, public meetings and formal written submissions. We currently have advisory groups for the implementation of the recommendations of the existing chemicals recommendations, approaches to managing the impact of nanotechnology on the introduction of industrial chemicals and the regulation of cosmetics and their ingredients. For the first time, we have used a formal evaluation process to obtain feedback on the impact of a major reform activity, namely the Low Regulatory Concern Chemical initiatives that were introduced in the 2004-05. To date, the feedback has been primarily from the perspective of industry and – as reported in this edition of *NICNAS Matters* – the draft report of this evaluation will be available shortly for comment. I expect that this impact evaluation will provide a robust evidence base on which to consider future reforms to the notification and assessment framework. ■

**SUBSCRIBE TO  
NICNAS MATTERS**

If you wish to subscribe to NICNAS Matters, please send an email to [the editor](#) marked “NM subscription”.

*Subscriptions are free of charge.*

**STAFF NEWS**

Mr Nick Walton – Team Leader, Compliance and Reporting – left NICNAS in mid June to take up a position at the National Greenhouse and Energy Reporting Office within the Climate Change Regulatory Authority.

Mr Lewis Norman has commenced as acting Team Leader, Compliance and Reporting.

*NICNAS Staff Awards over the last year are detailed on page 9.*





... in Bulgaria  
**NICNAS builds  
 capacity  
 through QSAR\*  
 training**

\* Quantitative Structure Activity Relationship

Safety assessments of industrial chemicals rely on the availability of human health and environmental hazard data information. However, this data is sometimes lacking on a number of human health and environmental hazard indicators for a number of chemicals. **Quantitative Structure Activity Relationship (QSAR)** predictive computational models are novel approaches which – when applied appropriately – represent a valuable tool to help address the data paucity issue for some chemicals.

NICNAS is building the capacity for appropriate application of QSAR models and has recently acquired the QSAR software developed in the Laboratory of Mathematical Chemistry (LMC) in Bourgas, Bulgaria. The QSAR models developed at the LMC are internationally recognised and have been developed with a number of regulatory schemes (US EPA, Danish EPA, Environment Canada and the European Commission) and input from industry, and are incorporated in part in the OECD QSAR Application toolbox. A unique feature of the LMC model is that it takes into account molecular flexibility as well as the metabolism of chemicals. Additionally, the level of accessibility to empirical data and databases exceeds that of other predictive models.

At the end of May two NICNAS scientists, Dr Julija Filipovska and Dr Mark Horsham undertook training on the application of LMC QSAR models in the LMC laboratories in Bourgas. They were joined by two scientists from the Dept of the Environment, Water, Heritage and the Arts (DEWHA) who undertake the environmental toxicity assessment of industrial chemicals for NICNAS. The workshop ran for five days and consisted of joint sessions detailing the background to the development of the models and use of the software, with separate sessions for the practical applications of the models relevant to the specific objectives of the two agencies. At present, the LMC software for predicting human health toxicity endpoints includes QSAR models for bacterial mutagenicity, chromosome aberrations, skin sensitization, and oestrogen and androgen receptor binding.

Through this visit NICNAS has laid the groundwork for ongoing collaboration with LMC, has gained knowledge for reliable interpretation as well as confidence in the outputs of predictions of the models. As this laboratory continuously improves the existing (and further develops models for new and more complex) endpoints, the relationship will allow NICNAS to stay abreast of key advancements in the field as they emerge. This training is expected to have a significant impact on capacity-building for QSAR expertise of NICNAS scientists as they embark on the major project of screening the 38 000 existing chemicals listed on the AICS and in their ongoing assessment of new chemicals. ■



**Top:** NICNAS staff members Julija Filipovska and Mark Horsham with fellow Australians and LMC lab members.

**Lower:** Last day of training – the OECD representative gave a presentation on future directions of the QSAR models related to complex toxicity endpoints like reproductive toxicity.





the global portal to information on chemical substances

The [eChemPortal](http://webnet3.oecd.org/echemportal/) is an internet gateway that provides direct free access to information on the properties of chemicals (physical-chemical properties, environmental fate and behaviour, ecotoxicity, toxicity) as well as to hazard and risk assessments. It allows users to simultaneously search multiple databases, most of which are prepared for government chemical review programs.

Please go to <http://webnet3.oecd.org/echemportal/> to access the portal!

### Contacting NICNAS

Do you have an industrial chemicals issue or matter you would like to raise with us?

Please feel free to call or write to us. Our contact points are:

**Freecall:** 1800 638 528 **Email:** [info@nicnas.gov.au](mailto:info@nicnas.gov.au)

**Post:** GPO Box 58, SYDNEY, NSW 2001 AUSTRALIA

### Chemical Quiz

These quiz questions are the second part of a set of Trivia questions asked at NICNAS staff Harmony Day celebrations, Friday 20 March 2009 ... [answers on page 8.](#)

1. What was the chemical which poisoned Ukraine's President Victor Yushchenko, causing changes to his face?
2. How many gallons of Agent Orange were used in the 1960s in Vietnam?  
(a) 5 million; (b) 10 million; (c) 20 million
3. What was the toxic gas that was released from the Union Carbide factory in Bhopal, India, in 1984, causing a major chemical disaster?
4. Which chemical is the subject of PEC assessment report number 28 (CAS No 50-00-0)?
5. What chemical was the subject of the first volume of the WHO Environmental Health Criteria (EHC) series?

### NICNAS site visits

NICNAS staff continue to make visits to the sites of chemical introducers, and one recent visit – to DuPont Australia's Sydney factory facility – included full participation in a spray-painting operation and the donning of disposable spray suits.

Staff members (*pictured on page one*) were joined by a staff member from the Department of the Environment, Water, Heritage and the Arts (DEWHA) and attended what was effectively a one-day condensed professional training course, giving insights into the methods for Original Equipment Manufacturers (OEM) paint application and refinish application, showing the parallels.

Such visits bring to life the reality of chemicals and chemical use which is otherwise experienced only as words on the page of an assessment report or submission!

*See also page 1 photo.*



NICNAS's Lorelie Flood in spray room attire, on a site visit.

### NICNAS Handbook under review

NICNAS's [Handbook for Notifiers](#) is currently under review.

The aim of the review is to update the document with all current information, as well as to streamline its format. This will enable all users – whether experienced notifiers or people/businesses who are 'new to the game' – to quickly access accurate, easy-to-read and up-to-date details of NICNAS's requirements for industrial chemical introducers.

A draft version of the Handbook will be scrutinised by members of the Industry Engagement Group (IEG – see page 3, [NICNAS Matters, May 2009 issue for more details](#)) and other key stakeholders before the document 'goes live' as an electronic document.

Suggestions about improvements to the current Handbook can be made by email to the [project manager](#).





## NICNAS welcomes new Parliamentary Secretary

NICNAS welcomes the Hon. Mark Butler (pictured left) Member of Parliament for Port Adelaide, South Australia since 2007, as newly appointed Parliamentary Secretary for Health.

Mr Butler brings to his role his broad experience working with the Government, providers, staff and professionals in the health sector – particularly in hospitals and in aged care – in his home state.

NICNAS would also like to thank Mr Butler's predecessor, Senator the Hon. Jan McLucas for the great interest and support she showed in progressing NICNAS's work. ■

## Multiple Chemical Sensitivity update

In November 2008, NICNAS and the Office of Chemical Safety and Environmental Health (OCSEH) released for comment a draft scientific report on Multiple Chemical Sensitivity (MCS). The report was entitled *A Scientific Review of Multiple Chemical Sensitivity: Identifying Key Research Needs*.

Multiple Chemical Sensitivity describes a condition characterised by a complex array of symptoms linked to exposure to low-level environmental chemicals.

Fifty-three submissions were received following a three-month comment period for the draft report. With a view to making submitted material available on the NICNAS website, and recognising the sensitivity of some material received, all respondents were contacted subsequently requesting permission and advice as to how their submission should be published.

[Submissions to the draft MCS report](#) are now available from the NICNAS website at [www.nicnas.gov.au](http://www.nicnas.gov.au) under "Latest News". All submissions are now being considered in the review of the draft MCS report. It is envisaged that the revised report will be available during the third quarter calendar 2009. ■

 Further information on MCS can be obtained by contacting [Dr Graham Harvey](#) on 02 8577 8851.

### New NICNAS publications

#### HEALTH HAZARD ASSESSMENT REPORTS

[DEG](#) (see also page 8)

#### INFORMATION SHEETS AND ALERTS

[1,4 Butanediol](#); [DEG](#) (see also page 8)

#### SUBMISSIONS

[MCS Report submissions](#)

[CHEMICAL GAZETTES - June 2009](#)

## Upcoming events

### AT HOME

#### July

2-12 [NAIDOC Week](#)

#### August

15-23 [National Science Week](#)

17 Industry Government Consultative Committee 34 meeting at NICNAS

18 Community Engagement Forum 20 meeting at NICNAS

#### October 2009

7-9 [IFSCC](#), Melbourne

### ABROAD

#### July 2009

11 – 15 OECD WPMN-WPN [Joint conference on Potential Environmental Benefits of Nanotechnology](#), Paris France

31 – 1 August APEC 8<sup>th</sup> [Chemical Dialogue](#), and Regulatory Forum, Singapore

#### September 2009

6-9 [Environmental effects of Nanoparticles and Nanomaterials](#), Vienna Austria

13-16 46<sup>th</sup> Congress, [European Societies of Toxicology](#), Dresden Germany

#### October 2009

11 – 16 [Stockholm Convention](#), Geneva, Switzerland

13-15 29<sup>th</sup> SIDS Initial Assessments, Netherlands

28-30 OECD WPMN 6<sup>th</sup> meeting, Paris France

#### December 2009

9 – 11 UN 18<sup>th</sup> Subcommittee of Experts on the [GHS of Classification and Labelling of Chemicals](#)



## Community Engagement Forum *update*



NICNAS Community Engagement Forum (CEF) members at the 22 May 2009 meeting (CEF 19): Dr Marion Healy (Director, NICNAS), Dr Bro Sheffield-Brotherton (environmental issues), Dr Liz Hanna (public health), Ms Renata Musolino (worker health and safety), Mr Nick Miller (Chair, NICNAS), Ms Jane Bremmer (environmental issues), Mr John Sawkins (Secretariat, NICNAS) and Ms Pamela Grassick (worker health and safety).  
One additional public health position is currently being filled.

The NICNAS Community Engagement Forum (CEF) continues to meet on a regular basis, and is currently finalising a Framework for Community Engagement. The Framework will be applied to all NICNAS activities – including reviews, communication and consultative programs around chemical assessment and implementation programs (such as the upcoming implementation of a program to prioritise chemicals on the Australian Inventory of Chemical Substances [AICS] – see page 6, [May 2009 NICNAS Matters](#) for more details).

CEF members represent three areas: the environment, public health and worker health and safety. They speak for community concerns in these three areas, and provide advice and expertise to most NICNAS advisory and technical groups (including the Nanotechnology Advisory Group and the Existing Chemicals Review working groups).

The CEF regularly produces a [Community Engagement Bulletin](#), which reports on their work and concerns. Subscriptions to the Bulletin are free. You can subscribe through the [NICNAS website](#). ■

## NICNAS information sessions

Free information sessions were held by NICNAS in Sydney and Melbourne during May 2009 providing an opportunity for NICNAS registrants to learn more about the activities of NICNAS and their responsibilities under the *Industrial Chemicals (Notification and Assessment) Act 1989*.

The sessions are not only targeted at organisations that have recently registered with NICNAS as they include specific sessions on the regulation of cosmetics, new chemical notification processes and advice about the checking of chemicals on the Australian Inventory of Chemical Substances. Forty-two industry participants attended the two training sessions which included an update from the [Australian Safeguards and Non-Proliferation Office](#) and their role in the regulation of chemicals in Australia as it relates to the Chemical Weapons Convention.

“These information sessions are an important awareness raising tool which NICNAS uses to

help industry achieve compliance with the legislation,” advises Mr Nick Walton, until recently Team Leader, Compliance and Reporting Team. “Registering with NICNAS is an important step toward achieving full-compliance with the Act. The [Register of Industrial Chemical Introducers](#) enables the Australian Government to contact people involved in introducing industrial chemicals and to provide the industry with information about their legal obligations and the safe use of industrial chemicals. These information sessions are designed to assist industry to understand their other obligations under the legislation which may apply to your business.”

More information sessions are planned for later in 2009. Details of future sessions will be published on the [NICNAS Training and Consultation Schedule](#). To register your interest for any of these sessions please email: [industry.training@nicnas.gov.au](mailto:industry.training@nicnas.gov.au). ■



## Existing Chemicals program review: scorecard / progress report on implementation of recommendations

The scorecard for implementing the recommendations which arose from the Existing Chemicals Program Review is provided below (as at 30 June 2009) with each recommendation categorised and current status indicated by shading:

**Green shading:** completed in 2007-08

**Blue shading:** completed in 2009

**Yellow shading:** in progress

**Pink shading:** not yet begun

### Communications

**3.1** Promote community awareness / education/ participation in Existing Chemicals Assessment Program

**3.2** Publish *Who's Who Guide* for industrial chemicals safety assessment & management

**3.3** Develop current awareness bulletin on international chemical safety information & issues relevant to program

**5.1** Develop, modify and publish process to filter out and re-direct non-NICNAS matters and determine level of response and/or assessment required

### Screening, Prioritisation & Assessment Products

**4.1** Develop an overall framework for screening of chemicals of concern

**4.2** Screen AICS listed chemicals for hazard and/or risk indicators elements

**4.4** Develop a framework to identify the circumstances under which down-stream use information is sought as being necessary for prioritisation

**5.2** Develop scientifically based criteria for prioritisation of chemicals for assessment

**5.3** Publish the prioritisation process and decisions

**5.4** Streamline the secondary notification process for existing chemicals originally assessed as new chemicals

**6.1** Develop new types of assessment products based on intended output and purposes

**6.2** Develop information requirements for each new assessment type

### Monitoring

**4.3** Examine the feasibility of a nationally co-coordinated system of surveillance monitoring and post market reporting

### Consultation

**5.5** Explore with States and Territories improved processes for coordination & cooperation including under its MOU group

**5.7** Explore an extension of the Bilateral Agreement with Canada to include existing chemicals.

**5.8** Explore the development of similar arrangements with other major trading countries.

### Refer to COAG Ministerial Taskforce

**5.11** Refer the proposal to investigate the barriers to effective implementation of NICNAS recommendations to Ministerial Taskforce on Chemicals and Plastics [Regulation Reform] for their consideration.

**7.0** Refer the range of issues related to the ban, severe restriction and/or the control of certain chemicals to Ministerial Taskforce on Chemicals and Plastics [Regulation Reform]

### Currently improving practice

**5.6** Continue to participate in chemicals management forums to ensure harmonised & streamlined regulation of industrial chemicals at national level

**5.9** Increase and broaden consultation with stakeholders during assessment process & before recommendations are finalised

**5.10** Recommendations are action statements that are evidence based, specific to the needs identified, achievable, and practical and be directed to the most appropriate body for implementation

Recommendation 3.2 will require the input of the Community Engagement Forum (see page 6), with completion expected in the first half of 2009-10.

The recommendations for screening and prioritisation will be substantially progressed in the first half of 2009-10 with consideration by expert working groups led by NICNAS. Recommendation 4.3 will be progressed when prioritisation is well under way in late 2009-10. Recommendations 5.5 and 5.7 on Consultation are ongoing and recommendation 5.6 will be substantially progressed in the first half of 2009-10 in concert with the CEF. ■



## Draft guidance and forms for modular assessment options for new chemical notifications

Recent amendments to the *Industrial Chemicals (Notification and Assessment) Amendment Regulations 1990* give effect to some outstanding LRCC recommendations.

Changes to the permit categories were detailed in the [December 2008 Chemical Gazette](#).

Changes to the certificate notification system (modular assessment) will allow the Director to remit a part of the notification fees for **non-self assessed** Standard, Limited and Polymer of Low Concerns applications in the following circumstances:

- the notified chemical is similar to a chemical which has been previously assessed by NICNAS, or
- the notified chemical is being notified at the same time as a chemical which is similar.


Draft guidance for modular assessment in these circumstances and a new form to apply for a reduction of fees are both available.

Changes to the certificate notification system (modular assessment) will also allow the Director to remit part of the notification fees for **non-self assessed** Standard, Limited and Polymer of Low Concerns applications in the following circumstances:

- an assessment of the notified chemical by the Therapeutic Goods Administration (TGA) of the chemical under the *Therapeutic Goods Act 1989* is available
- an assessment of the notified chemical by the Australian Pesticides and Veterinary Medicines Authority (APVMA) under the *Agricultural and Veterinary Chemicals Code Act 1994* is available
- an assessment of the notified chemical by Food Standards Australia New Zealand (FSANZ) under the *Food Standards Australia New Zealand Act 1991* is available.

NICNAS is currently working with the APVMA, FSANZ, and TGA to develop mechanisms to facilitate the provision of APVMA, FSANZ, and TGA assessment reports to NICNAS.

For further enquiries on the changes to the certificate notification system or if you would like to utilise one of the options, please contact Louise Stedman on 02 8577 8830, email: [louise.Stedman@nicnas.gov.au](mailto:louise.Stedman@nicnas.gov.au)

 To obtain a copy of the draft guidance and application forms for comment, please contact Louise Stedman or Robyn Thomsen 02 8577 8815, email: [robyn.thomsen@nicnas.gov.au](mailto:robyn.thomsen@nicnas.gov.au) or Julie Brown 02 8577 8870, email [julie.brown@nicnas.gov.au](mailto:julie.brown@nicnas.gov.au) ■

**To help with implementation, NICNAS would like to consult with industry regarding the clarity and usability of the forms and guidance prior to publication on the NICNAS website.**

## New info sheets & assessment reports on three chemicals

In the [September 2008 NICNAS Matters](#), we reported NICNAS had made submissions to the National Drugs and Poisons Schedule Committee (NDPSC) for three chemicals not previously scheduled. Two of these were prompted by concerns over public safety arising from investigations into the chemicals by NICNAS following media reports, and governmental and public enquiries. We can now report that health hazard assessment reports have now been completed on all three chemicals and that – in addition – Existing Chemicals Information Sheets have been prepared for all three chemicals.

These are available as follows:

**1,4-Butanediol** – an industrial solvent and intermediate used in the production of various plastics and polymers: [1,4 B Hazard Assessment Report](#) – [1,4 B Info Sheet](#)

**Diethylene glycol (DEG)** – an industrial chemical used in brake fluids, glues and as an anti-freeze agent: [DEG Hazard Assessment Report](#) – [DEG Info Sheet](#)

**Methyldibromo glutaronitrile (MDBGN)** – a preservative and biocide used in a wide range of consumer products including cosmetics: [MDBGN Hazard Assessment Report](#) – [MDBGN Info Sheet](#) (these two items to be posted on the [NICNAS website](#) soon)

Answers (from page 3  
Chemical Quiz)  
1. Dioxin  
2. 20 million gallons  
3. Methyl isocyanate  
4. Formaldehyde  
5. Mercury



## NICNAS staff awards round-up .....

Most months of the year, representatives of the NICNAS staff identify staff members who have made a significant recent contribution to the work of NICNAS. The following is a brief summary of the awards made during the last 12 months or so.



**April 08: Julija Filipovska (A)**

For her marvelous effort in planning a TGA workshop, seeking feedback from NICNAS assessors, liaising effectively with TGA reps, and organising topics for the workshop.

**May 08: Sami Syed (B) & Lewis Norman (C)**

For efficiently arranging air quality checks for NICNAS's building and OHS workstation assessment for 25 staff + collating recommendations made by OHS experts.

**June 08: Julie Brown (D)**

For excellent organisation and administrative support in preparation for OECD meeting and bilateral visits to USA and Canada + actively participating within the NICNAS Social Club.

**July 08: Justin Roberts (E)**

For fantastic management of registration renewal process + having plans in place for all aspects of registration renewal.

**August 08: Adam Brymora (F)**

For setting up NICNAS Wiki and uploading useful resources for assessors + educational presentation on Toxicokinetics at risk assessment workshop.

**Sept 08: Rosemary Sager (G)**

For fantastic effort in setting up composition of the Cosmetic Advisory Group, through resourcefulness, interpersonal skills + enthusiasm in helping NICNAS set up various reps and experts.

**Oct 08: Marianne Hernandez (H)**

For providing consistently high quality work in all rotations as a year-in-government student at NICNAS ... notably for finalising report on NICNAS Annual Service Charter Survey.

**Nov 08: Rebecca Janson (I)**

For playing a key role in a number of important projects requiring extensive liaison with different stakeholders, completing them with thoroughness and timeliness.

**Dec 08: Melissa Shaw (J) & Peter Robinson (K)**

For innovative ideas on Prioritisation of AICS and in engaging other team members, initiating training of team members in tools used in the project + making informative presentations at ISG meetings, with passion and a cheerful nature.



**Jan & June 09: Robyn Thomsen (L)**

*For dealing with high workload with enthusiasm and care + progressing cross-team work with Reform + keeping up-to-date with the many New Chemicals duties.*

*For exceptional ability and enthusiasm in organising admin and logistical arrangements for OECD Clearing House Meeting on New Chemicals.*

**May 09: Deanna Kettle (M)**

*For excellent assistance with the IT system transfer: organising staff testing of access to Health system, software requirements etc + planning logistics on the day of move and helping staff with process, resulting in a smooth transition.*

© Commonwealth of Australia 2009. This work is copyright. Apart from educational or training purposes and any use as permitted under the Copyright Act 1968, no part may be reproduced by any process without prior written permission from the Commonwealth. Requests and inquiries concerning reproduction and rights should be addressed to the Commonwealth Copyright Administration, Attorney General's Department, Robert Garran Offices, National Circuit, Canberra ACT 2600 or posted at: <http://www.ag.gov.au/cca>

