

THIS SUBMISSION WAS SENT AS AN E-MAIL ON 30 APRIL 2008 AND HAS BEEN DE-IDENTIFIED AT THE WRITERS REQUEST

Hello Siepie

Firstly, my apologies for the slightly slow response to your call for comment. I lost track of the timeline on this document in amongst my research projects and other work commitments.

I would like to make some very brief comments and also pose a question or two. My comments apply to consultant's Recommendation 3 and are as follows:

- The recommendation appears favourable from a Workplace Health and Safety regulatory perspective in that it would improve both the quantity and relevance of information available to WHS regulators on these products e.g. we should see some ingredients for low risk commercial use disinfectants, which have not previously been listed on the AICS, becoming listed. Also, the implementation of this recommendation would result in some evaluations of occupational health and safety risk which have not previously been available for say, disinfectants used by commercial cleaners. It is understood that the availability of these evaluations might be subject to bottlenecks where lower priority disinfectants await assessment in the NICNAS process.
- It is not clear whether a move of some low-medium risk disinfectants from TGA jurisdiction to NICNAS would also result in a need to relabel to the workplace hazardous chemicals COP; however I expect it would for many given that they are designed to kill organisms, so some at least would be captured as hazardous chemicals.
- It is possible that while some formulations might fall just over into the TGA jurisdiction for labelling etc; others at slightly lower strength may fall under the TGA capture point and be subject to NICNAS labelling and assessment. Will this result in some confusion if these two formulations with only slightly different concentrations have different labels and their assessment reports have a different focus.

Regards