

Submission from Warwick Brooks, Regscom Pty. Ltd., 21st Oct. 2007 Input to the Study into Chemicals & Plastics Regulation

Dear Commissioner,

As a consequence of discussing this matter through the forum of the Dangerous Goods Advisory Group (DGAG), a consultants association based in Melbourne, I wish to echo the submission of Jeff Simpson of Haztech Environmental, as follows:

1. That we have a set of model regulations for each of our chemical regulations (across Health, Safety and Environment) and that each jurisdiction then mirrors these 100%. This would give us one set of regulations to work with across Australia, administered by a local Authority to deal with our needs.
2. When an Authority / Industry, Professional or Community Body wants a variation; this must be then agreed across all jurisdictions.
3. When an individual State, Territory or Federal Authority decides to start a new area of regulation, this has to be discussed across Australia before it is first implemented. It should require an in-principle agreement that when introduced into another jurisdiction, they will follow the initially-set-up approach, and if changes are needed then the original will need to be changed rather than having a variation (as in points 1 and 2 above).
4. Where regulations overlap (e.g. Schedule Poisons and Hazardous Substances) or where one control scheme allows a chemical but another doesn't (but should), the same mechanism should be used. For example, there are some allowed food chemicals (e.g. some emulsifiers) that aren't allowed as industrial chemicals because they are not on the AICS.

I agree with Jeff's comment that many of us waste time over subtle but costly differences (e.g. Dangerous Goods, Hazardous Substances & Schedule Poisons) and over significant difference (such as in our Environmental regulations on chemicals).

There are other overlapping regulations such as Schedule Poisons, labelling industrial chemicals for domestic use, or chemicals under one control scheme which should be automatically allowed under another; UNLESS there is a clearly justified reason.

If we can't harmonise inside Australia how can we expect to harmonise with the rest of the world.

These simple changes will make significant cost savings without any reduction in protection.

Regards

Warwick Brooks.
Dangerous Goods Consultant.

Regscom Pty. Ltd.
PO Box 186,
Drouin VIC 3818