



Ian Wright & Associates

Consultants Safe Transport Operations
Regulatory Compliance

Unit 1, 119 Dendy St
Brighton VIC 3186

Tel/Fax 03 9592 0188
Mobile 0419 385 767

ian@ianwright.com.au
www.ianwright.com.au

ABN 42 915 883 586

22 Oct 2007

Input to the Study into Chemicals & Plastics Regulation

Dear Commissioner,

I am recommending that as a minimum all Australian DG Regulations should be 'Nationally Uniform'. Why each State or Territory is able to continue to be able to select different parts of national template regulation is not in the best national or international interest.

1. There is a set of nationally uniform model regulations in each of our chemical regulations (across Health, Safety and Environment) and that each jurisdiction then 100% mirror these so we only have one set of regulations to work to across Australia, but only at a local Authority level we can get access 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? Why?
3. When a 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, with an in principle agreement that when introduced into another jurisdiction that 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 1/ and 2/).
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 (e.g there are some allowed food chemicals (e.g. some emulsifiers) that aren't allowed as industrial chemicals because they are not on the AICS).

Comment: DG Consultants are tired of wasting 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). Overlapping regulations (such as Schedule Poisons labelling industrial chemicals (for domestic use) or chemicals under one control scheme 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.

Sincerely,

Ian Wright MCIT, AIMM, MSAE
Principal