

Submission from KenPrice, Riskom International, 21 Oct 2007

Input to the Study into Chemicals & Plastics Regulation

Dear Commissioner,

This submission is based on that put together by Jeff Simpson and supports the request that:

1/ Australia have a set of model regulations in each of our chemical regulations (across Health, Safety and Environment) and that each jurisdiction then 100% mirrors these so we only have one set of regulations to work to across Australia, with a local Authority 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.

3/ there be established a mechanism, similar to that used by the dangerous goods transport regulatory bodies for monitoring and adjusting the regulatory requirements across the nation;

4/ Where regulations overlap (e.g. Schedule Poisons and Hazardous Substances) or where one control scheme allows a chemical but another doesn't, then there should be a clear mechanism available for resolving any such inconsistencies.

Comment: As Mr Simpson indicated, I too am 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). Or 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.

The United Nations has published a Globally Harmonised System for classifying and Labelling Chemicals, which Australia should adopt with flexibility to allow our trading partners to adopt later. It would remove many of these discrepancies, which are tedious for industry trying to work across the country.

I have worked in Government and industry for over 35 years, in Australia and many other regions and it continually disappoints me how disparate are our Australian dangerous goods laws when compared with Europe or North America. The only partially successful area is in transport where we manage to follow the UN system.

Regards

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