

Submission from Linda Haydon, 23 Oct 2007

Input to the Study into Chemicals & Plastics Regulation

Dear Commissioner,

I submit that:

1/ We 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, but 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 then be 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. With an in principle agreement that when introduced into another jurisdiction, the initially set up approach will be followed, 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 does not, 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: Time is wasted 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.

We need to harmonise within Australia to facilitate harmonisation with the rest of the world.

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

Regards

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