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Dear Regulatory Burdens: manufacturing, wholesale and retail.

My submission goes to the core of the Australian government body: NICNAS which has the responsibility of determining if a new chemical can be brought into the country etc.

I cannot understand how a body like this should be industry funded. In fact we all have to be registered as an importer as well as pay for new chemicals to be considered. The amount is substantial.

Commercially, I have to declare a vested interest as I am a chemical raw materials importer and distributor. I represent a medium size coatings resin company from Germany: Worlee Chemie. They are a customer responsive producer of specialty resins (binders) for paint systems. Most of their work is in new developments in the water based area. What we tend to find is that we have new products we would like to introduce which would be better for ecology and health and safety at the factory level but when we get to the evaluation stage, it becomes obvious that the volumes in the Australian market do not compensate for the costs involved in getting the product registered.

This tends to leave the Australian market languishing with old technology. This old technology is usually more harmful to environment and worker combined, hence NICNAS is effectively working against its own charter which is to protect environment and worker / public safety. A lot of the evaluation of these polymers has been already done in Europe, the USA, and Japan etc and are readily used, so the evaluation is duplicated just for our small 20M population country.

The set up of NICNAS tends to favour the large multi-national who has much greater resources. It undeniably stifles innovation and entrepreneurial activities.

I am just planting this seed; I could provide some examples of my meaning if required.

I hope that this short submission is considered in earnest.

Best regards

Darren Spies
Managing Director.