

## break o'day catchment risk group

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Chemicals and Plastics Study  
Productivity Commission  
Locked Bag 2  
Collins Street East  
Melbourne Vic8003

15 April 2008

Dear Sir,

### **Submission on Draft Report on Chemicals and Plastics Regulation (2008)**

Assessments of all (new and already in use) chemicals and plastics used by industry or agriculture should be carried out taking their potential risk to ecosystem and human health into account.

Chemicals and plastics should be comprehensively demonstrated to be safe, not just to show no evidence of harm, as is currently the case. The precautionary principle as laid down by current legislation should be implemented. Current internationally accepted "best practice" methods of risk assessments, which would automatically mean implementing the precautionary principle at all levels of assessment and control-of-use of chemicals and plastics should be used.

The regulation of endocrine disruptors, immunotoxics, and chemicals and plastics causing adverse changes in gene function (which may be inherited), needs to be introduced promptly and effectively.

Assessment of the effects of mixtures, and their regulatory control can no longer be safely or ethically disregarded.

Cost: benefit analyses, including the community and social and health costs need to be promptly undertaken with results readily available to the public.

Regulatory control needs to be clearly defined and transparent for purposes of accountability and responsibility. This means from the point of initial full assessment to the point of use with indicators for performance monitoring.

Environmental and human health assessments need to be undertaken immediately and monitored long term (i.e. looking at the health of the ecosystem as a whole, not just at the levels of certain chemicals at certain times). Without these, as under the current regulatory frameworks, low dose mixture effects and unforeseen adverse impacts may be missed and not recorded for many years.

Without doubt any adverse effects of chemicals and plastics on water quality is reflected in poorer ecosystem health.

Any proposed regulatory changes should be applied consistently across all levels of Government and between all States and Territories.



Dr Alison Bleaney OBE

Sec BODCRG – an organization affiliated to National Toxic Network.