

Submission from Steve Ilett, DIC Australia P/L, 22nd Oct 2007

Input to the Study into Chemicals & Plastics Regulation

Dear Commissioner,

With respect to the "Input to the Study into Chemical & Plastics Regulation" I would like to submit our recommendations as follows:

1/ that 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.

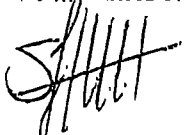
2/ When an Authority / Industry, Professional or Community Body wants a variation, this must be then agreed across all jurisdictions.

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 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).

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

Yours sincerely,



Steve Ilett

DIC Australia P/L

This submission contains NO confidential material