

## **Submission from Donna Baker, Chem-Trend Australia, 23 Oct 2007**

### **Input to the Study into Chemicals & Plastics Regulation**

Dear Commissioner,

As the responsible party for classifying imported and manufactured products for our Australian company I agree entirely with the submission of Mr Jeff Simpson of Haztech Environmental and therefore mirror his comments 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 a 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).

We should not be 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).

Overlapping regulations, such as Schedule Poisons, labelling industrial chemicals (for domestic use), or chemicals under one control scheme that should be automatically allowed under another; UNLESS there is a clearly justified reason.

If we can't harmonise inside Australia how can we expect to harmonise with the rest of the world. These simple changes will make significant cost savings without any reduction in protection.

Regards

Donna Baker  
Health and Safety Officer  
Chem-Trend Australia Pty Ltd