

Dear Commissioner,

Considering the subject proposals, we wish to request the Commission to address the following matters:

1. A set of model regulations be proposed covering each of area of chemical regulations, namely, Health, Safety and Environment. Further,) that each jurisdiction in Australia to which a jurisdiction must both refer proposed changes and from which, accept and implement the same regulations to ensure that one set of regulations must be observed across Australia.
2. A single national authority in each jurisdiction be available deal with all regulatory processes.
3. When the national authority endorses a variation, the variation applies across all jurisdictions. The models of the SUSDP and ACTDG are examples.
4. Where regulations overlap (e.g. Schedule Poisons, Hazardous Substances, Dangerous goods, Food Standards) or where one control scheme allows a chemical but another does not (e.g some allowed food chemicals are not allowed as industrial chemicals because they are not on the AICS), then such overlaps are removed.

It is essential that chemical regulation is harmonised within Australia to allow successful harmonisation with such international schemes such as the GHS and REACH.

In addition, the steps outlined above would create significant cost savings throughout the community, without sacrificing protection.

Best Regards

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