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Australian Paint Manufacturers' Federation Inc.

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Dear Dr Doolan

### **SCHEDULING POLICY FRAMEWORK REVIEW**

Thank you for the opportunity to attend the Chemicals Stakeholder Forum on 22 November 2016.

The Australian Paint Manufacturers' Federation Inc. (APMF) represents the interests of its members to ensure the sustainability of the Australian paint and surface coatings industry. The industry produces some \$2.5 billion worth of surface coatings products and employs over 4,000 persons. The APMF represents around 50 companies and our members account for over 90 percent of all surface coatings produced in Australia.

The APMF supports the key objectives of this review to seek improvements in both policy and processes to achieve a more effective chemicals management framework.

Following the forum, our comments are as follows:

#### **Policy Void Following NCCTG Disbandment**

The APMF would support the creation of an ad-hoc working group to periodically review the SPF and Scheduling Policy. This ad-hoc group should be made up of representatives from both industry and government and its key purpose would be to provide advice to the TGA on broad strategic issues.

Other roles and functions could include:

- Promoting active on-going engagement and input from the relevant sectors who operate under the Scheduling Policy Framework; and
- Promoting transport communication and information sharing on strategic issues between the different stakeholder groups.

### **Decision-Making Principles**

The APMF would welcome a trial to allow presentations to the Scheduling Committee where appropriate.

### **Transparency**

The APMF supports the concept that the Public Summary document should be initially prepared by the application for public consultation. If the Scheduling Committee seeks to amend the Public Summary document, it should work with the applicant to review the document.

### **Scheduling Interim Decisions**

The APMF supports the general consensus that interim decisions should be open to full public consultation and that more feedback should be provided to applicants in situations where their applications do not result in the initial desired outcome.

### **Timing of Decisions**

Early alert mechanisms to ensure that the applicant, jurisdictions and key stakeholders have maximum time available for activities associated with any decision, would be in keeping with the Council of Australian Governments principles for best practice consultation.

### **Proactive Rescheduling**

The APMF would recommend that proactive rescheduling activities should be in keeping with risk-benefit methodologies.

### **GHS Labelling**

Our position is that GHS Labelling should be allowed across the range of surface coatings products, including biocidal anti-fouling products, as now accepted in Europe. Allowing GHS labelling for anti-fouling products would be consistent with all other chemicals used in the manufacture and maintenance of boats.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Phillips', written in a cursive style.

Richard Phillips  
Executive Director