

2 November 2016

NICNAS Review

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NICNAS Review Team

## **NATIONAL INDUSTRY CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME (NICNAS) REFORMS: CONSULTATION PAPER 4**

The Australian Paint Manufacturers' Federation (APMF) appreciates the opportunity to comment on Consultation Paper 4 (CP4). The APMF represents the surface coatings industry in Australia. Surface coatings manufacturers turn over approximately \$2.5 billion per annum and around 90% of all surface coatings used in Australia are currently manufactured here.

Rebalancing the regulatory requirements of assessment efforts to be more proportionate to the risks should encourage innovation and investment. A reduced regulatory burden (and associated cost) will also encourage industry to introduce newer and safer chemicals.

Our comments on key issues dealt with by CP4 now follow:

- The APMF supports the reform direction and the use of a contemporary principles-based Act with detail in delegated legislation.
- NICNAS and industry should work together to develop and deliver the necessary detail in the delegation legislation to achieve the reform objectives.
- Sensitivity remains around the issue of Confidential Business Information and the right balance needs to be struck to protect CBI and transparency.
- The reforms, at no stage, should result in any disadvantage for local manufacturing in preference to imported goods.
- The timeframe is considered workable and delays to the reform timetable would impact adversely on our industry.
- As noted in our previous submission to CP3, the APMF is highly supportive of the stated early harvest reforms, especially with the exemption of PLC's from notification requirements.
- The APMF continues to support the proposed use of risk assessments undertaken by a trusted international regulator.

- The APMF also continues to support the proposed proportionate approach to future NICNAS compliance activities.
- The APMF is also pleased to note that our recommendation to increase the initial six month transition period to 12 months has been adopted in CP4.

The surface coatings sector is also one of the largest users of NICNAS assessment services. Hence, the APMF is committed to supporting NICNAS to achieve the best reform package possible.

A rebalanced and more streamlined Scheme, supported by greater use of appropriate international assessments, will enable Australia to be more innovative and thus be able to retain industry and jobs in Australia, whilst also ensuring that our workers, the public and our unique environment are protected.

Should you require any additional information or clarification, please contact me direct on: (02) 9876-1411.

Yours sincerely

A handwritten signature in black ink that reads "R Phillips". The signature is written in a cursive, slightly slanted style.

Richard Phillips  
Executive Director