

5 May 2016



Australian Paint Manufacturers' Federation Inc.

Chemicals and Biotechnology Assessments Section
Environment Standards Division
Department of the Environment
GPO Box 787
CANBERRA ACT 2601

A NATIONAL STANDARD FOR THE ENVIRONMENTAL RISK MANAGEMENT OF CHEMICALS

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 has now reviewed the March 2016 Discussion Paper and attended a Discussion Paper Workshop. The following comments are now made in relation to the Draft National Standard.

- 1 The APMF supports the establishment of a National Standard to provide a nationally consistent approach to environmental risk management of industrial chemicals across Australia.
- 2 Our industry also supports the key design features outlined on Page 13 of the Discussion Paper and the proposed outcomes-based approach to the risk management of industrial chemicals.
- 3 We also strongly recommend that any new National Standard does not duplicate any existing regulations (Dangerous Goods) or licensing regimes.
- 4 Also, any definitions used within the National Standard should be consistent with current definitions in use. For example, the current NICNAS Working Definition for Nanomaterials.
- 5 It was noted that: Although Low Concern chemicals will require minimal (or no) risk management, it is intended that they will still be scheduled under the National Standard.

The Draft Standard states that "For a chemical to be scheduled, it will need a completed environmental risk assessment and risk management recommendation from the risk assessor. NICNAS are proposing to assess any chemical if requested by the introducer for a fee. The resulting risk management recommendation made in the risk assessment will allow scheduling of any chemical under the National Standard."

If the community is to achieve a streamlined assessment of all industrial chemicals for environmental hazards within a workable period of time (say 5-10 years), then the risk assessment function should be carried out by industry for chemicals of low concern. NICNAS should only assess chemicals of intermediate and high concern.

- 6 The APMF supports alignment with international standards and the use of the GHS Classification system for the environment to classify risks and the use of applicable warning statements on SDS's.
- 7 However, to date, Government has consistently taken the position that GHS Environmental Product Labelling is not required in Australia and labelling software packages have been developed accordingly. If the Australian Government sought to change its position on GHS Consumer Environmental Labelling in the future, then industry should be provided with a workable timeline (@ 5 years) to amend the existing GHS product labels.
- 8 Finally, the APMF questions whether another term could be developed in place of the term Schedule, to avoid any confusion with the current Scheduling of Poisons and Drugs. A suggestion would be to use a term such as an ERM (Environmental Risk Management) Hazard.

The APMF appreciates this opportunity to attend the Public Workshop and make a written submission on the Draft Standard and we look forward to a further opportunity to comment on the revised Draft Standard, when it is released for public comment in July 2016.

Yours faithfully

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

Richard Phillips
Executive Director