

17 May 2016



Australian Paint Manufacturers' Federation Inc.

Department of Agriculture and Water Resources

Attention: Deloitte Touche Tohmatsu Label Review

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REVIEW OF DUPLICATION BETWEEN AGRICULTURAL AND VETERINARY CHEMICAL AND WORK HEALTH AND SAFETY LEGISLATION

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 May 2016 Discussion Paper. The following comments are now made in relation to the Review.

Our position is that Australia should accept GHS classification for biocidal Antifoulings (remove APVMA requirements). GHS classifications are accepted in Europe under the biocidal products directive.

Option 1 would be a logistical nightmare – having to add extra WHS statements to already cluttered APVMA-approved labels, will not benefit anyone (including the end-user).

The Safe Work Australia (SWA) Labelling code requires that hazardous ingredients are disclosed with concentrations, so compliance with current APVMA active ingredient declarations is in accordance with GHS requirements and can be met via the SWA Code.

Attached is a comparison of the hazard statements for a members' product SeaQuantum Ultra under APVMA labelling requirements, and under GHS - European label. The information provided in the GHS version is less detailed but all the points are covered (health hazard, environmental hazard, first aid response) with extra information about the flammable hazards under GHS.

Given that there is no reduction in the quality of information provided to users, and that the information can be provided in a larger more readable font. This will also be consistent with all the other chemicals used in the manufacture and maintenance of boats.

Cost is another important issue. The current cost to specific APVMA labels is considerable.

If you require any further information please contact me direct.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Phillips', is written over a white background.

Richard Phillips
Executive Director

ANTIFOULING SEAQUANTUM ULTRA

DIRECTIONS FOR USE –ALL STATES

ANTIFOULING SEAQUANTUM ULTRA is used to control general marine fouling on vessels constructed from Steel, Fibreglass & Timber. Not recommended for use on aluminium vessels unless an effective anti-corrosive primer is used. Not recommended for use on high speed vessels. Not recommended for use on high-wash areas such as propellers and bow thrusters.

SURFACE PREPERATION: ANTIFOULING SEAQUANTUM ULTRA is applied over an anti-corrosive coating (such as SAFEGUARD UNIVERSAL ES) or existing ANTIFOULING SEAQUANTUM ULTRA which has been high pressure water washed and allowed to dry thoroughly. **MIXING:** Thoroughly power mix before use

THINNING: Thin up to 15% with THINNER No. 7

APPLICATION METHOD: Spray is preferred, brush/roller are acceptable but extra coats may be required to achieve the correct thickness.

COVERAGE: Theoretical coverage is 4.2 m²/L per coat.

DRY FILM THICKNESS: Recommend at 125µm per coat.

Normally 2 - 3 coats are required. Contact Jotun for specific advice.

DRYING TIME @ 23°C: Allow minimum of 7 hours between coats.

TIME BEFORE LAUNCHING @ 23°C: Allow min. 7 hours and max. 48 hours.

Consult Product Data Sheet for detailed information.

NOT TO BE USED FOR ANY PURPOSE OR IN ANY MANNER, CONTRARY TO THIS LABEL, UNLESS AUTHORIZED UNDER APPROPRIATE LEGISLATION.

PROTECTION OF WILDLIFE, FISH, CRUSTACEA & ENVIRONMENT

Very toxic to aquatic life. During application of the coating, employ methods designed to prevent introduction of the coating into aquatic environment. Because of the very high toxicity of the product, users should ensure that spillages are promptly cleaned up according to the MSDS, with any washings from the clean up retained on site and disposed of according to the site license or other state, territory or local government requirements. When removing old product, users must insure that NO paint dust, chip or flakes reach shipyard or dockyard waters, or other waters.

Following removal of coating and/or application of new coating, all coating chips and spent abrasives, unused coating and any other waste produces from coating removal or application must be disposed of in accordance with state/territory/local government regulations.

STORAGE & DISPOSAL

Store in the closed original container, in a cool, well ventilated area. Do not store for prolonged periods in direct sunlight. Do not re-use any empty container; small amounts of paint can be allowed to solidify by leaving the container unsealed. Dispose of containers by crushing and disposing of to an approved waste management facility. Do not pour leftover paint down drains. Keep unwanted paint in sealed containers for disposal by an approved waste contractor. Do not burn empty containers or product.

SAFETY DIRECTIONS

Poisonous if inhaled. May irritate the nose and throat. Will irritate the eyes and skin. Repeated exposure may cause allergic disorders. Avoid contact with eyes and skin. Do not inhale vapour or spray mist. When opening the container, and preparing spray wear cotton overalls, over normal clothing, buttoned to the neck and wrist (or equivalent clothing), elbow length chemical resistant gloves and full facepiece respirator. When using the prepared spray, wear cotton overalls, over normal clothing, buttoned to the neck and wrist and a washable hat, elbow length chemical resistant gloves, impervious footwear, and full facepiece respirator. If product on skin, immediately wash area with soap and water. If product in eyes, wash it out immediately with water. After use and before eating, drinking or smoking, wash hands, arms and face thoroughly with soap and water. After each day's use, wash gloves, contaminated clothing and respirator (if rubber, wash with detergent and warm water).

RE-ENTRY STATEMENT

Do not enter treated areas until the spray has dried, unless wearing cotton overalls buttoned to the neck and wrist (or equivalent clothing) and chemical resistant gloves. Clothing must be laundered after each days use.

FIRST AID

If poisoning occurs, contact a doctor or Poisons Information Centre (Phone 131126: New Zealand 0800 764 766). If swallowed DO NOT induce vomiting. Give a glass of water.

MSDS

Additional information is listed in the Material Safety Data Sheet.

GHS DIRECTIONS

Danger. Flammable liquid and vapour. Harmful if swallowed or inhaled. Causes serious eye damage. Causes skin irritation. May cause an allergic skin reaction. Very toxic to aquatic life with long lasting effects. Avoid breathing vapour. Wear protective gloves. Wear eye or face protection. Keep away from heat, hot surfaces, sparks, open flames and other ignition sources. No smoking. Use only outdoors in a well-ventilated area. Avoid release to the environment. Collect spillage. **IF INHALED:** Remove the victim to fresh air and keep at rest in a position comfortable for breathing.

IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do.

Continue rinsing. Immediately call a POISON CENTRE or physician. If skin irritation or rash occurs: Get medical attention. Store in a well-ventilated place. Keep cool. Dispose of contents and container in accordance with all local, regional, national and international regulations.