

THE UNIVERSITY OF
NEW SOUTH WALES



PROFESSOR DAVID BLACK
PROFESSOR OF ORGANIC CHEMISTRY
SCHOOL OF CHEMISTRY

28 May 2009

Dr Marion Healy
Director
National Industrial Chemicals Notification
and Assessment Scheme
GPO Box 58
SYDNEY NSW 2001

Dear Dr Healy,

I am writing to you regarding a notice in the NICNAS Gazette of April 2010 relating to the amendments to the schedule of the Act.

I am a Professor of Organic Chemistry at the University of New South Wales, and perhaps more relevantly for this particular communication, the current Secretary General of the International Union of Pure and Applied Chemistry (IUPAC).

IUPAC is a scientific, international, non-governmental and objective body that serves to advance the worldwide aspects of the chemical sciences and to contribute to the application of chemistry in the service of Mankind. Since its establishment in 1919, IUPAC has been engaged in many different projects, but one of the most central is the standardisation of chemical nomenclature. IUPAC chemical nomenclature is the internationally accepted system of naming chemical compounds, and one of the eight IUPAC Divisions is devoted to chemical nomenclature and structure representation. The rules for naming organic and inorganic compounds are printed by IUPAC in two separate publications, which are regularly updated.

I therefore note with surprise that NICNAS, the key national industrial chemicals regulator, plans to remove the IUPAC name from acceptable chemical names from the schedule of the *Industrial Chemical (Notification and Assessment) Act 1989*. I am particularly concerned that NICNAS believes that this amendment is minor, and the reason given by for the amendment is international best practice. I can assure you that this is not international best practice, as the IUPAC nomenclature is still the internationally accepted standard for chemical compounds. Australian chemical regulators should continue to accept this name as it is the one that is recognised, understood and utilised internationally by chemists.

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I look forward to hearing back from you on this matter. If you or your staff require any further information on IUPAC and our work, please feel free to contact me at d.black@unsw.edu.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "David Black". The signature is written in a cursive, slightly slanted style.