

Dr Matthew Gredley
NICNAS
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16 August 2010

Dear Dr Gredley

We value the opportunity to comment on the *Further Consultation on Proposed Amendments to the Schedule to the Act and the Requirements to Prepare and Publish Summary Report* published on the NICNAS website.

The first NICNAS proposals concerning the proposed amendments were announced in the *Chemical Gazette* in April. We were pleased to see the second consultation announced in the *Latest News* section of the website, but expected to also see the announcement in the *Gazette* as per the first announcement. A more consistent approach to publishing consultations would be much appreciated; this could be managed effectively with a separate section of the website devoted to consultations along with short announcements in the *Gazette* and *Latest News*.

We support the July refined proposal regarding Summary Reports.

The issues we see with the other proposed changes to the ICNA Act are as follows:

1. Increased regulatory burden and cost for industry

The changes proposed will increase regulatory burden and cost for industry. This increased burden and cost should not occur unless justified and NICNAS has not provided a justification.

2. Screening of all new industrial chemicals for the POPs

We believe requesting this additional information for all LTD and STD notifications is additional to the requirements published in 2004 Chemical Gazette notice. The current proposal means that all new chemicals will be screened for POPs characteristics whereas the 2004 notice limits the screening to chemicals where there is a potential for POPs characteristics.

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3. Proposal to require information on how public at large may be exposed to the chemical

The consultation states that “there will be occasions where the data required under this item will be minimal” which suggests that much of the time, NICNAS will be requiring extensive data. NICNAS explains that this expansion is to help NICNAS carry out adequate risk-assessment on new chemicals. However there is no evidence that the current risk assessment is inadequate. This is an additional regulatory burden on industry, without justification for the need for this additional information.

4. Changes to some physical and chemical properties requirement

This proposal seems to be making information requirement more specific and inflexible and question whether the changes proposed will significantly increase the accuracy of the risk assessment. Increased requirements and reduction in flexibility can have a significant impact on industry's costs.

5. Removal of option to provide IUPAC name as a chemical ID

We are pleased that NICNAS has agreed to maintain the IUPAC name as an acceptable chemical name. We agree that neither the CAS name nor the CAS number should be mandatory when notifying a chemical to NICNAS.

Please contact the undersigned if you require any further information or have any queries.

Yours sincerely



Kathy Nolan
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