

Thank you for the opportunity to comment on the NICNAS CRIS discussion paper.

Amway of Australia comments are as follows:

- The absence of any cost impact assessment on industry and identification of tangible benefits which could not be derived from adopting recommendations being developed in the EU, USA, Japan, New Zealand and Canada from similar exercises is lacking on which to make an assessment as to the overall value of the programme to Australian industry.
- We have concerns with the NICNAS proposal for the existing chemicals prioritisation process given that no consideration has been given to the significant cost burden which will fall on industry for the collection of volume and use data for the 38,000 chemical ingredients listed on AICS.
- We do not support industry cost recovered funds being directed towards this process
- We suggest that all of NICNAS' cost recovered activities be identified and costed.
- There is an inappropriate focus on low risk chemicals which has increased the regulatory burden for chemicals of low concern

Regards, Ian Gamble

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