

From: Barry Alchin
To: [Community Affairs, Committee \(SEN\)](#)
Subject: Industrial Chemicals Bill 2017 & related Bills
Date: Saturday, 10 June 2017 10:54:40 AM

For the attention of The Standing Committee on Community Affairs.

Please find attached a copy of the submission by ROAM (Reduce Obstructions to Australian Manufacture) to the Productivity Commission enquiry into chemical & plastics regulation in 2008. The Productivity Commission recommended that NICNAS accept accreditation of industrial chemicals by USA & Europe.

Prime Minister Abbott & Industry Minister MacFarlane announced in 2012 that there would be reform of NICNAS.

NICNAS have then developed a reform process which will increase the regulatory burden on business at the same time as increasing costs.

Whilst it is a positive move that introducers may self assess industrial chemicals of low concern we believe that Australia should merely accept accreditation of any new industrial chemical by Europe & the USA. There is simply no need for us to duplicate but there is a real need for our manufacturing industries to be internationally competitive & in a timely manner.

Most new industrial chemicals are introduced to our market from overseas producers by the importer –generally a trader. That trader generally will make the decision on importing & complying with our regulations & paying the price but in most markets likely volumes of the new industrial chemical will be insufficient to allow recovery of the cost of compliance in Australia- so the trader makes the only sensible decision -to not seek accreditation. His alternative is to engage with the actual manufacturer of the new industrial chemical in an attempt to have the costs shared. Of course such manufacturers find our process, its complexity & its duplicitous costs to be quite ludicrous.

The current Bill(s) increase complexity for industry & is out of step with other global economies & is unlikely to deliver meaningful reduction in the over regulation of this vital sector of the Australian economy. Innovation will be impeded.

There is absolutely no need for Australia to have its own unique regulatory

system for industrial chemicals.

Barry Alchin

Chair



The Shire Economic Development Alliance

Web: www.shirebiz.net.au

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P.O. Box 157, Oyster Bay NSW 2225 ABN 96 435 488 947