



3 August 2012

NICNAS Review
Department of Health and Ageing
MDP 88
GPO Box 9848
CANBERRA ACT 2609

Dear Sir/Madam

RE: PUBLIC SUBMISSIONS TO THE REVIEW OF THE NATIONAL INDUSTRIAL CHEMICALS NOTIFICATION AND ASSESSMENT SCHEME

The National Farmers' Federation (NFF) is pleased to provide a submission (attached) to the above review. The NFF ask that those who are responsible for reviewing the role and functions of National Industrial Chemical's Notification and Assessment Scheme (NICNAS) consider the impact and implications for chemical users, and make changes where appropriate to avoid unintended consequences for chemicals users.

The NFF is not involved in the registration of chemicals, but represents a significant group of individuals who use chemicals for their daily business operations. For this reason NFF is keen to ensure that the regulatory settings ensure the competitiveness of the Australian chemical industry for the benefits of those in the agricultural sector.

Should you wish further clarification, please do not hesitate to contact David McKeon at the NFF Office on 02 62695666.

Yours sincerely

A handwritten signature in black ink, appearing to read "Matt Linnegar".

MATT LINNEGAR
Chief Executive Officer



National Farmers' Federation

Submission to the

Review of the National Industrial Chemical's

Notification and Assessment Scheme

3 August 2012



National Farmers' FEDERATION

Member Organisations



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1. The National Farmers' Federation

The National Farmers' Federation (NFF) is the peak national body representing farmers and, more broadly, agriculture across Australia. It is one of Australia's foremost and respected lobbying and advocacy organisations.

Since its inception in 1979, the NFF has earned a formidable reputation as a leader in the identification, development and achievement of policy outcomes - championing issues affecting farmers and the advancement of agriculture.

The NFF is dedicated to proactively generating greater understanding and better-informed awareness of farming's modern role, contribution and value to the entire community.

One of the keys to the NFF's success has been its commitment to presenting innovative and forward-looking solutions to the issues affecting agriculture, striving to meet current and emerging challenges, and advancing Australia's vital agricultural production base.

The NFF's membership comprises of all Australia's major agricultural commodities. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations collectively form the NFF.

The 2009 re-structure of the NFF has enabled a broader cross section of the agricultural sector, including the breadth and the length of the supply chain, to become members through an associate member category.

Each of the state farm organisations and commodity council's deal with state-based 'grass roots' issues or commodity specific issues, respectively, while the NFF represents the agreed imperatives of all at the national and international level.

2. Introduction

The NFF welcomes the opportunity to make a submission on the review of the National Industrial Chemical's Notification and Assessment Scheme (the Review). This NFF submission will focus on the need for NICNAS to consider the role of agricultural sector in the use of chemicals. The NFF supports the investigation that NICNAS is doing to see how the regulatory settings may be improved to enhance both the competitiveness of the Australian chemical industry and public health and environment outcomes.

The NFF recognises that a careful balance needs to be struck on roles and functions of NICNAS in the role of scientific assessment of chemical risks to public health, occupational health and safety and the environment. Clarification is required to protect the interests of chemical users who are looking to use products on a small and large scale. The NFF supports arrangements that can improve transparency and administrative efficiency within Government, while allowing effective and safe use of chemicals by industry.

3. NICNAS Review

The NFF wholly supports the Australian Government Department of Health and Ageing and the Department of Finance and Deregulations' review of NICNAS to improve and enhance the competitiveness of the Australian chemical industry, public health and environmental outcomes.

At present, NICNAS undertakes evidence-based assessments of risk to public health, occupation health and safety and the environment of certain industrial chemicals.

The NFF urges the review to consider and adopt the following recommendations:

NFF recommends that NICNAS considers our previous submission that specifically relates to the chemicals used in coal seam gas on agricultural land

Farmers need to be assured that the chemicals that come into contact with commodities on their farms are suitable for contact with agricultural produce, and that the relevant withholding period has been enacted.

NFF notes that a manual outlining risk assessment and risk management may be useful for the chemical industry. However it is vital that all relevant government bodies and stakeholders are fully engaged during the consultation period and preparation of the manual to ensure the accuracy and credibility of the content.

The NFF would support a manual if NICNAS is able to fully outline the content and the information and research methods that will be employed to complete the manual.

NFF recommends that an appropriately appointed body replaces the Standing Committee on Chemicals (SCOC) to ensure that there is consistency on chemical policy issues across the country, to eliminate ambiguity and duplication across Australian Government and State agencies.

4. Conclusion

Chemicals play an important role in the agricultural sector and related primary industries. The NFF would like to see that farmer's interests are considered through this review and subsequent operations of NICNAS.

NFF Contact

David McKeon
Manager –Rural Affairs
Ph: 02 6269 5666
Email: dmckeon@nff.org.au