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**Review of duplication between agricultural and veterinary chemical and work health and safety legislation – A call for public submissions – Plastics and Chemical Industries Association (PACIA) submission.**

1. PACIA welcomes the opportunity to provide comments to the review of duplication between agricultural and veterinary chemical and work health and safety legislation.
2. PACIA is the peak national body representing the chemistry industry. PACIA members include chemicals manufacturers, importers and distributors, logistics and supply chain partners, raw material suppliers, plastics fabricators and compounders, recyclers, and service providers to the sector.
3. The Australian chemicals and plastics industry is the second largest manufacturing sector in Australia. Our industry employs more than 64,000 people, with every job also creating five more in related supply chains. The industry contributes \$11.6 billion to gross domestic product, and supplies inputs to 112 of Australia's 114 industries.
4. Australia's entire society – businesses, consumers and governments – along with its natural environment receive enormous benefits associated with the safe, responsible and sustainable use of industrial chemicals. By supplying 112 of 114 Australian industry sectors, chemistry assists Australia to respond and address global challenges of protecting the environment, ensuring a safe and sustainable food supply and improving standards of living in Australia and elsewhere.
5. PACIA members are key participants in the agricultural chemical market as well as being key suppliers to companies engaged in both agricultural chemical and veterinary medicines sector.
6. PACIA has supported the introduction of GHS labelling since its inception some 20 plus years ago. The global harmonisation of labelling requirements to communicate the hazards associated with chemical use have significant benefits, raising workplace safety standards in many parts of the globe and reducing the cost to business resulting from the operation of disparate labelling regimes across jurisdictions.
7. While PACIA has generally supported the introduction of GHS labelling, PACIA's position opposing the introduction of GHS labelling for agvet chemical products has remained unchanged for almost a decade. PACIA believes that the inclusion of GHS hazard based information on Agvet chemical products is both unnecessary and potentially very confusing. The inclusion of GHS hazard information on agvet labels will significantly increase labelling costs and deliver no improvement to health and safety outcomes as these are already adequately managed by the Australian Pesticide and Veterinary Medicines Authority (APVMA).
8. The initial cost to the Australian agvet industry of complying with GHS labelling is estimated to be many tens of millions of dollars.
9. GHS hazard labelling is intended to support the employer's risk assessment of the chemical products and/or substances used in their workplace that is required under Australia's

workplace health and safety laws. In relation to agvet chemical products, the required risk assessment is carried out by the APVMA prior to registering the agvet chemical product for use in Australia.

10. The APVMA registration process includes approval of the label attached to the agvet chemical product which incorporates the directions for use as well as instructions relating to safe handling and storage of the product. The directions and instructions included on the approved product label are determined on the basis of a full risk assessment of the hazards associated with the use of the agvet chemical product to ensure that the product, when used in accordance with the label directions, poses no unacceptable risk to human health, the environment and Australia's trading interests.
11. The APVMA's assessment of the risk to human health considers the risks arising from the consumption of agricultural produce to which the agvet chemical products have been applied as well as risk to farm workers who will handle, mix and apply the agvet chemical product and re-enter the treated areas following application.
12. In PACIA's view, employers, farm workers and other users of agvet chemical products should not make their own independent risk assessment of agvet chemical products as this has been done by the APVMA. Farm workers and users of Agvet chemicals should, as the law requires, follow the directions and instruction specified on the product label.
13. When viewed in terms of the risk management evolutionary process, Australia's agvet chemical labelling is further advanced along the evolutionary path than GHS labelling. GHS labelling provides information to assist users undertake their own risk assessment to mitigate the human health risks associated with using a chemical or substance, whereas APVMA approved agvet chemical labels are the product of a full risk assessment undertaken by the APVMA and direct how the product should be used to ensure that there is no unacceptable risk to human health.
14. PACIA supports adoption of Option 3 – that is, the reinstatement of the full exemption of agvet chemical labelling from the WHS workplace chemical labelling requirements. The exemption should be reinstated as a matter of urgency to prevent any further unnecessary expenditure arising from the current requirement to incorporate GHS hazard information on agvet chemical product labels by 1 January 2017.
15. If you have any questions regarding our comments, please contact me on 03 9611 5411.

Yours sincerely



Bernard Lee  
Director – Policy and Regulation