



**SUBMISSION IN RESPONSE TO
WORK HEALTH AND SAFETY BILL 2011**

28 JULY 2011

INTRODUCTION

CropLife Australia is the peak industry organisation representing the agricultural chemical and biotechnology (plant science) sector in Australia. CropLife represents the innovators, developers, manufacturers, formulators and registrants of crop protection and agro-biotechnology products. The plant science industry provides products to protect crops against pests, weeds and diseases, as well as developing crop biotechnologies that are key to the nation's agricultural productivity, sustainability and food security. The plant science industry is worth more than \$1.5 billion a year to the Australian economy and directly employs thousands of people across the country.

CropLife member companies spend more than \$13 million a year on stewardship activities to ensure the safe use of their products on the environment and human health. CropLife ensures the responsible use of these products through its industry code of conduct and has set a benchmark for industry stewardship through programs such as **drumMUSTER**, ChemClear[®] and Agsafe Accreditation and Training.

CropLife welcomes the opportunity to provide comment on the Work Health and Safety Bill 2011. Nationally consistent work health safety laws are critical to delivering better workplace safety outcomes, while removing unjustified and costly interstate differences in regulation. CropLife has long supported measures that improve the efficiency and effectiveness of Australia's regulatory system. Consequently, measures to harmonise Australia's workplace health and safety systems are very welcome, potentially reducing the administrative and regulatory burden on Australian businesses that operate across state boundaries.

CropLife is committed to the life cycle stewardship of its products. Our members have developed and implemented stewardship schemes to reduce and control risks associated with exposure to agricultural chemicals throughout their life cycle. This includes stewardship activities that complement existing state and territory workplace health and safety legislative schemes to ensure the safe storage, handling and ultimate use of agricultural chemicals. The industry's **drumMUSTER** and ChemClear[®] programs ensure that agricultural chemical waste is safely collected and disposed of. Under the CropLife Australia Code of Conduct, CropLife members may only supply chemicals to suppliers and retailers that are accredited under the Agsafe Accreditation and Training program, protecting workers through ensuring that all legislative requirements for the establishment are being met.

CropLife has made several, significant efforts to resolve key shortcomings associated with the treatment of agricultural chemicals under the Work Health and Safety Bill. CropLife remains disappointed that these issues have not been resolved as they present a significant risk that the safety of agricultural chemicals will be undermined by the provision of contradictory, confusing and potentially incorrect label information.

Protecting the safety of agricultural chemical users is of paramount importance to CropLife members. CropLife therefore cannot support changes that will result in worse safety outcomes for farmers and other chemical users.

EXECUTIVE SUMMARY/RECOMMENDATIONS

CropLife welcomes and supports measures to improve the efficiency and effectiveness of the regulatory system. Removing inconsistencies between different states and territories has the potential to not only reduce the costs on business, but improve workplace safety outcomes by ensuring that the same standards are applied irrespective of the jurisdiction. It also assists workers and employers that operate in multiple jurisdictions to be aware of their obligations irrespective of their present jurisdiction.

CropLife recommends minor amendments to the Work Health and Safety Bill 2011 that will improve the efficiency of the proposed reforms, improve worker safety and generate greater efficiencies for governments. Should they be adopted, CropLife's recommendations will ensure that Australia's regulatory system for agricultural chemicals remains compliant with best practice guidelines developed internationally by the World Health Organization (WHO), the United Nations Food and Agriculture Organization (FAO) and CropLife International.

CropLife recommends that agricultural chemical labels should continue to be regulated by the Australian Pesticides and Veterinary Medicines Authority (APVMA). The Work Health and Safety Bill 2011 should reinstate previous recognition that APVMA approved labels are sufficient for workplace labelling requirements.

Implementation of this change will have no impact on the availability of hazard information available to workers, while preserving the integrity of the APVMA's risk based system. It will ensure that users of agricultural chemical products have access to the best information to safeguard their use. It will also ensure that the regulatory system is comprehensive and consistent. Finally, this recommendation will avoid the possibility that current agricultural chemical product labelling requirements administered by the APVMA are inconsistent with the proposed provisions of the Bill.

AGRICULTURAL CHEMICAL LABELLING

All chemicals are subject to a wide range of regulations designed to ensure that the benefits from their use outweigh their risks. However, given the wide range of uses for chemicals in Australia, regulations are not identical for all classes of chemicals. This is appropriate, as the risks presented by different classes of chemicals require different regulatory responses. For example, the regulatory requirements for pharmaceuticals are very different to those for agricultural chemicals. Agricultural chemicals may present a far greater potential hazard to the environment than pharmaceuticals. Consequently, in Australia agricultural chemicals are subject to an environmental risk assessment where pharmaceutical chemicals are not.

The differences in hazard and risk are reflected in the different ways that chemicals are regulated.

Care therefore needs to be taken to ensure that new rules designed to improve workplace safety do not inadvertently diminish the protections provided by other regulatory systems. New regulatory responses must take into account the broad landscape of chemical regulation and operate within that landscape to generate benefits. New rules that are inconsistent, duplicative and complicated will increase costs and decrease safety standards associated with chemical use. CropLife cannot support inconsistent and duplicative proposals that will not achieve the regulatory objective of improving workplace safety outcomes.

The Work Health and Safety Bill 2011 must avoid inconsistency with existing regulation. Any inconsistency makes it impossible for companies to comply with both sets of rules, to the detriment of companies and users.

CropLife is particularly concerned that the Bill imposes requirements for agricultural product labels that are inconsistent with the existing regulatory scheme for agricultural chemical products.

CropLife notes that even in circumstances where information desired by Safe Work Australia is not included in an agricultural chemical product label, there are already mechanisms available to address any shortcoming. The current regulator for agricultural chemicals, the Australian Pesticides and Veterinary Medicines Authority (APVMA), has the power and responsibility to require registrants to change labels to ensure they contain adequate instructions to protect human health and safety.

Rather than creating additional conflicting demands through separate regulatory requirements, Safe Work Australia should seek to work within the existing framework for agricultural chemical products to address any work health and safety concerns.

■ *Removing recognition for APVMA approved labels will introduce complexity and inconsistency*

Currently, all agricultural chemical products must carry a label that has been approved by the APVMA.

When conducting its pre-market assessment of an agricultural chemical product, the APVMA is legislatively required to assess the risk that a product will present to worker safety, consumer health and the environment. This obligation is enshrined in Section 14 of the Agricultural and Veterinary Chemicals Code Act 1994:

14 Grant or refusal of an application

- (3) (e) if the application is for approval of an active constituent or registration of a chemical product, that the use of the constituent or product in accordance with the instructions for its use that the APVMA has approved or approves:
- (i) would not be an undue hazard to the safety of people exposed to it during its handling or people using anything containing its residues; and
 - (ii) would not be likely to have an effect that is harmful to human beings; and
 - (iii) would not be likely to have an unintended effect that is harmful to animals, plants or things or to the environment; and
 - (iv) would not unduly prejudice trade or commerce between Australia and places outside Australia.

The APVMA's risk assessment of the hazard to the safety of people exposed to a chemical product is described in Volume 3, Chapter 6 of the Agricultural Manual of Requirements and Guidelines (Ag MORAG). The APVMA goes through an extensive, science based process to assess the risk to workers that may be exposed to chemicals. It includes an assessment of the risks from all the hazards associated with the product. The outcomes of these risk assessments are hazard and precautionary statements placed on labels for those real risks associated with the use of the product.

Hazard and precautionary statements are only a small section of the information that must be included on labels. The comprehensive information provided to users enables the APVMA to satisfy itself that the workplace health and safety, consumer and environmental impacts are being effectively managed when products are used in accordance with label directions.

Imposing a separate and potentially contradictory labelling scheme will diminish these protections. CropLife does recognise that there are concerns that agricultural chemical product labels do not always contain all the same information as is available on Safety Data Sheets (SDSs). However, this outcome is a function of the risk management approach employed by the APVMA and reflects the different purposes of SDSs and agricultural product labels.

As currently drafted, the Work Health and Safety Bill 2011 will also require that hazard and precautionary statements will need to be imposed on labels for all the potential hazards associated with the product.

Under the Bill, Globally Harmonised System for Classification and Labelling of Chemicals compliant risk phrases must be included on labels. This can mean that hazards that have been independently and scientifically assessed as extremely unlikely, or even demonstrated to not be present, would be required to be placed on labels.

For example, an agricultural chemical may present a hazard that would require the phrase R63 "possible risk of harm to the unborn child" under the Workplace Labelling Guide. However, during the risk assessment conducted by the APVMA, it may be determined that workplace exposure under even a worst-case scenario is insignificant and extremely unlikely to result in an exposure level that would result in the hazard being realised. As no further action needs to be taken to manage this risk from workplace exposures, the risk phrase offers no utility to the user and may not be required.

The two different regulatory approaches employed by the APVMA and proposed under the Bill deliver different, and inconsistent, outcomes. This is an unacceptable result as it makes compliance by registrants of agricultural chemical products impossible.

- *GHS hazard information is of poorer quality*

The Bill proposes to import hazard and precautionary statements from the *United Nations Globally Harmonised System for the Classification and Labelling of Chemicals* (GHS). Hazard phrases under both the Hazardous Substances Information System (HSIS) and the GHS are general in nature, as they can be applied to a wide range of chemicals. Particularly for many industrial chemicals this is because the ultimate use of that chemical cannot be identified at the time that it is packaged and labelled. However, this assumption does not hold for agricultural chemical products.

GHS classification and labelling has potentially significant benefits in countries that do not have a comprehensive or advanced risk management scheme for agricultural chemical products. This is not true in Australia where a science based and rigorous risk assessment scheme operates.

For agricultural chemical products, the end-use is known and limited to these pre-determined and risk assessed uses. This enables more specific and direct instructions to be used that are relevant to the assessed use pattern.

Hazard information is often little use to users in the workplace without the corresponding directions and precautions that must be followed to ensure worker safety is protected.

Often the hazard and precautionary statements required by the APVMA are more targeted and more directly relevant to the APVMA approved use than those that would be required under the Bill. It is difficult to see how less direct and targeted GHS-compliant hazard statements will improve workplace safety.

Arguments have been proposed that while the risk assessment may be valid for the authorised uses identified on agricultural chemical product labels, this may not be the case where agricultural chemicals are applied “off-label” or not in accordance with the prescribed instructions within the label. While CropLife does not support “off-label” use for a variety of reasons, including trade risks and liability concerns, we recognise that some jurisdictions do currently allow agricultural chemicals to be applied “off-label”. This usually occurs to control a pest, weed or disease that has not specifically been identified for control by that product. It may also occur when a chemical is applied to a different crop to that identified on the label.

These circumstances are more likely to have an impact on the environment, trade and consumer protection elements of the APVMA’s risk assessment. It is difficult to envisage a situation where use of a chemical to control a different pest, or use on a different crop would result in such a major change to the exposure of a worker that an insignificant risk would become significant.

- *Hazard information availability is not limited by exclusion from labels*

CropLife challenges the contention that failing to include insignificant or extremely remote hazards on labels limits the capacity for workplaces to meet their obligations in conducting a risk assessment for all the hazards in a workplace.

Agricultural chemical labels are only one part of a comprehensive system for communicating information to users about the products with which they may come into contact in the workplace. Under existing state and territory regulations, workplaces must maintain up-to-date SDSs for each hazardous substance in the workplace. SDSs can contain additional information about the potential hazards of a substance that may not be relevant to the safe and responsible use of the agricultural chemical product.

Agricultural chemical labels and SDSs perform separate functions. Labels are the primary communication mechanism that informs how the product must be safely used. In contrast, SDSs can contain information about a product that may be relevant through storage, transport and handling of the product. These different purposes will legitimately result in different information being presented on a label and in an SDS. For this reason it is not legitimate to expect that the information contained on each would be the same. Differences are expected given the different purpose of each document.

In cases where agricultural chemicals are accidentally spilled or leaking from a container, workers should not be encouraged to unnecessarily expose themselves through seeking hazard information from a leaking container. SDSs serve as the authoritative document in these circumstances.

Workplaces can fulfil their legal obligations and conduct risk assessments with the hazard information contained in SDSs. Further, for the workplace use of the chemical, the risk assessment conducted by the workplace need only consider whether they have the necessary equipment, training and knowledge to comply with the instructions contained on the product label.

- *Changing labels undermines existing industry stewardship schemes*

CropLife members are committed to the life cycle stewardship of their products. Currently, CropLife members contribute \$13 million annually towards ensuring that the risks from agricultural chemicals are managed. CropLife’s subsidiary, Agsafe, operates the Accreditation and Training program that ensures that employers and workers that come into contact with agricultural chemicals through manufacture, wholesale and distribution chains have the necessary procedures in place to protect against adverse impacts.

Under the CropLife Australia Code of Conduct, CropLife members must not supply agricultural chemicals to premises or organisations that do not maintain a current accreditation under the Agsafe Accreditation and Training program.

The Accreditation and Training program is a quality assurance program that ensures workers understand the hazards associated with agricultural chemicals. Authorised workplaces and employees are trained in the different purposes of labels and SDSs. They are trained that all the information that users need to use an agricultural chemical safely is on the label.

Should labels be required to host additional hazard statements that relate to irrelevant hazards, a comprehensive re-training scheme will need to be undertaken by industry or government to retrain personnel on what hazard information is relevant to the product, and what can be ignored.

- *Inconsistent with international best practice guidance for registration and labelling of agricultural chemical products*

The FAO/WHO *Guidelines for the registration of pesticides* demonstrates that registration decisions should be made on the basis of a risk assessment as opposed to a hazard assessment. This ensures that registration decisions can be made that take into account the specific circumstances of the likely use. This is because the local needs, social and environmental conditions, levels of literacy, climatic conditions and availability of appropriate pesticide application and personal protective equipment can all have an impact upon the actual level of exposure, and therefore risk, from an agricultural chemical.

The problem with requiring the addition of hazard information where a risk based assessment demonstrates that the risk is at best miniscule or remote is that inclusion of a statement will have the effect of significantly overstating the magnitude of the risk.

The GHS itself recognises this. Annex 5 of the GHS describes how information on risk based labels might operate within the GHS context. It states that:

“it has been recognised that some systems provide information about chronic health hazards in consumer products only after considering additional data regarding potential exposures to consumers under normal conditions of use, or foreseeable misuse... Where this exposure assessment and determination of likelihood of injury reveal that the potential for harm to occur as a result of the expected exposures is insignificant, chronic health hazards may not be included on the product label for consumer use.”

While the GHS discussion relates specifically to consumer products, the key issues are relevant for classes of chemicals (like pesticides in Australia) that are packaged, labelled and intended to be used for only pre-determined specific uses. Indeed, the World Health Organization and the Food and Agriculture Organization in their *Guidelines on Good Labelling Practice for Pesticides* identify agricultural chemical products as consumer products for precisely this reason.

The GHS does recognise that this approach may not always be appropriate in workplace situations:

“Consumer product labels in some systems are based on a combination of hazard and risk. However, acute and physical hazards may be indicated on the label, while chronic health effects labelling based on risk is not indicated. This may be due in part to the expectation that exposures to some consumer products are of short duration and may not be sufficient to lead to the development of chronic health effects as a result of those exposures. These expectations may not be accurate where consumer products are used in a workplace, e.g. paints or adhesives used by construction workers on a regular basis.”

In Australia, however, the APVMA *does* actively consider the risk from likely workplace exposure to agricultural chemical products. The risks from workplace exposures are an intrinsic and essential element of the APVMA’s risk assessment process. Acute and chronic hazards resulting from this assessment that are non-trivial and non-miniscule are included on labels.

The FAO/WHO *Guidelines on Good Labelling Practice for Pesticides* confirm that the current APVMA approach is consistent with this *Good Labelling Practice* guide. They provide that:

“The GHS... is based on an assessment of the intrinsic hazardous properties of the chemicals involved without assessing levels of exposure. This is justifiable in the case of acute (immediate) health hazards, which may occur after short exposure to (often) a relatively large amount of a pesticide (e.g. splashes during mixing or loading, accidental spills of the concentrated product, leaking spray equipment). In such cases, the intrinsic hazard or a pesticide will to a large extent reflect the risk.

“However, for chronic health hazards, which may only occur after repeated and/or long term exposure to a pesticide, the intrinsic hazard may overestimate actual risk. The GHS therefore accepts that risk based labelling can be applied by the competent authority to the chronic health hazards of chemicals in the consumer product setting.

“For the purposes of these guidelines, pesticides are considered as consumer products from the moment they are distributed sold or used. Therefore, for chronic health hazards, labelling may be based on risk assessment.”

As a consequence, the FAO and WHO **do not** recommend inclusion of chronic hazard information on a pesticide label if an appropriate risk assessment is available for the relevant conditions of use. This includes germ cell mutagenicity (GHS Chapter 3.5), carcinogenicity (GHS Chapter 3.6), reproductive toxicity (GHS Chapter 3.7) and specific target organ systemic toxicity – repeated exposure (GHS Chapter 3.9).

Claims by Safe Work Australia that hazard labelling represents international best practice for workplace labelling are, at least for agricultural chemical products, substantially incorrect. The *Good Labelling Practice* guide does recognise that it may not always be feasible for developing countries to complete appropriate risk assessments for local conditions. In such cases, hazard labelling may be the only option for chronic hazards. Fortunately, Australia has an advanced risk assessment process conducted by the APVMA. This being the case, there is no justifiable reason why Australia should adopt an approach to agricultural chemical product labelling that is a ‘last resort’ for developing countries that do not have the scientific, financial or technical resources to conduct a local risk assessment.

COST OF IMPLEMENTATION

CropLife notes that the Consultation RIS did not reconsider the costs and benefits of removing the recognition for APVMA-approved labels. Rather, previous analyses conducted by Safe Work Australia will not be reopened.

Despite this, CropLife considers there are serious deficiencies that have been highlighted over several years that are yet to be addressed. CropLife notes that the Productivity Commission's Research Report on Chemicals and Plastics Regulation recommended that:

"The Australian Safety and Compensation Council should conduct a regulatory impact assessment of the proposal to require agricultural and veterinary chemical products that are also workplace hazardous chemicals to carry workplace hazardous chemicals labels. The assessment should identify alternatives and the costs and benefits of the options. The Workplace Relations Ministers' Council should only adopt the proposal if it can be demonstrated that it would deliver a net benefit to the community that any alternative.

"Until the regulatory impact assessment has been completed, recognition of agricultural and veterinary chemical product labels for occupational health and safety purposes should continue to apply."

In response, the Council of Australian Governments (COAG) directed Safe Work Australia to consider the costs and benefits of any proposed regulatory changes. Unfortunately, Safe Work Australia's assessment significantly underestimates the likely costs associated with implementing a dual hazard labelling scheme for agricultural chemicals. The analysis ignores many aspects of costs that will accrue through operation of a dual system. CropLife's estimations of likely costs indicate a greater burden on industry and government than that indicated by the January 2010 Regulation Impact Statement.

■ *Benefits unlikely to occur*

The health benefit estimates within the RIS are arguable. Currently, the entire estimation of health benefits is dependent upon the flawed presumption that increasing the amount of hazard information available on labels will generate improved worker safety outcomes. CropLife challenges this presumption on two grounds.

Firstly, CropLife contends that instead of resulting in improvements in worker safety, increased label confusion is likely to result in poor decisions being made by users when applying agricultural chemical products. This will increase the health costs resulting from accidental or negligent misuse that must be at least as significant as the benefits estimated in the RIS.

Secondly, it remains difficult to see how risks, that have only been excluded from labels on the basis that they present only a minuscule risk because exposure levels are so low, could result in any significant improvement in worker health.

Ultimately, if there are circumstances where additional risks need to be placed on labels to improve the protections afforded to users, the APVMA has the authority, resources and legislative remit to be able to include additional information on labels.

Maintaining the APVMA's authority to regulate agricultural chemical labels in the workplace has significant benefits in terms of regulatory efficiency and consistency. If the policy objective sought by Safe Work Australia can be accommodated within that system, it should be employed. The regulatory solution currently proposed is not the most efficient and effective way to meet the policy objective.

■ *Significant costs omitted or underestimated*

While implementation of either dual labelling or additional hazard labelling for workplaces will increase health costs, CropLife understands that its view is not shared by Safe Work Australia. However, in its assessment of implementation costs, significant additional costs have not been included in its risk assessment. Inclusion of these costs would significantly alter the conclusions drawn in the RIS on the benefits of making changes to the agricultural chemical labelling system.

Changes to labels are not made lightly by industry. As labels are the primary mechanism for communicating the means of safe use to users, great care is taken to ensure that they communicate all the necessary critical information for safe use. This overlaid with the economic cost of potentially designing, developing and printing new labels, relabelling products and disposing old or redundant labels is significant.

CropLife estimates that the cost of changing labels is likely to be around \$1,900 per pack size. As most product registrations contain more than one pack size for the product, each pack size will require its own new label to be developed. While the APVMA maintains a register of approximately 9,000 products, a significantly greater number of new labels will need to be developed.

Safe Work Australia assumes that approximately 70% of the APVMA's current product inventory will need to be relabelled under the new workplace labelling requirements. Assuming that this is correct, and assuming that approximately 40% of products maintain an average of three pack sizes, the likely cost to industry of relabelling for compliance with new workplace requirements will be \$21.6million:

$$\begin{aligned} 40\% \times 70\% \times 9,000 \text{ products} \times \$1,900.00 \times 3 \text{ pack sizes} &= \$14.4\text{m} \\ 60\% \times 70\% \times 9,000 \text{ products} \times \$1,900.00 \times 1 \text{ pack size} &= \$7.2\text{m} \end{aligned}$$

This does not include the costs of making an application to the APVMA to have a label change made. Currently, making an application to the APVMA to change to a label's user safety directions costs an applicant \$6,185.00 Applied across the product inventory the collective cost to the industry will be:

$$70\% \times 9000 \text{ products} \times \$6,185.00 \text{ per application} = \$38.9\text{m}.$$

The likely cost to industry just from relabelling and approving existing products could total \$60.5 million.

As the APVMA would be required to reassess a significant proportion of product labels, this would have detrimental impacts on the APVMA's regulatory efficiency and timeliness. The cost from further delays to new product registrations and other APVMA functions have not been included in the chemicals RIS.

Should changes be made to the way that agricultural chemicals are labelled, users will need to be trained to interpret new label instructions. Users will need to be trained on how to discriminate between those risks that must be taken into account when using the product (and which are already included on labels) and those hazards which present such miniscule and unlikely risks through normal use that no additional action is required for further risk mitigation.

ChemCert training enables users of agricultural chemicals to manage risks and safely apply agricultural chemicals in accordance with the directions on a label. Currently, a *ChemCert* re-accreditation for agricultural chemical users costs \$250.00. Re-accreditation occurs every five years after the initial accreditation. Requiring all current users of agricultural chemicals to redo their training to be able to identify, interpret and adequately respond to new label information will impose additional costs on users. Currently, there are approximately 125,000 farms in Australia, and several thousand additional workplaces that employ staff that are either required to apply agricultural chemical products, or who are come into contact with them through transport, storage, handling and sale.

At least 200,000 users, staff and other personnel will require additional training to apply and interpret new label instructions. The collective cost to users and other workplaces from additional training could approach \$50 million.

The chemicals RIS also fails to account for the opportunity cost associated with industry being forced to comply with a revised labelling scheme, rather than developing and registering newer, better targeted and softer agricultural chemical products. Should changes to labelling requirements mean that a particular product no longer becomes economically viable in the Australian market place registrants are likely to withdraw that product.

Fewer products on the market mean fewer legal uses and a proportionate increase in the chances that pests, weeds or diseases will develop resistance. A poorly controlled pest or disease can result in a loss of 80-90% of a crop. The ultimate cost to the economy varies dramatically depending on the ability to import replacement food. For example, when 80-90% of the banana crop was destroyed by Cyclone Larry in 2006 the price of bananas increased from \$1.20/kg to \$15/kg. While producers lost \$360 million in production value, the total cost to consumers from increased prices exceeded \$400 million. No price on increased pest resistance risk has been included in the cost assumptions in the chemicals RIS.

CropLife estimates that the direct cost to manufacturers, registrants and users from changes to chemical labels will be at least \$110.5 million. This excludes costs that may be borne by growers and consumers from increased pest, weed and disease resistance risks which could potentially be much greater.

CONCLUSIONS

The worker safety benefits are unlikely to be realised as the hazard information for agricultural chemicals is:

- a) Only omitted where scientifically validated and independently assessed data demonstrates that the hazard presents only a miniscule risk that is exceedingly unlikely to occur following the use or foreseeable misuse of a chemical product; and
- b) Already available on MSDSs that must be present at each workplace where hazardous chemicals are present,

and that;

- a) Significant elements of costs to industry have been underestimated or omitted; and
- b) The costs from increasing risk of pest resistance to growers and consumers resulting from lesser agricultural chemical product choice have been ignored,

CropLife notes that the regulatory impact analysis is fundamentally flawed and cannot support its present conclusions.

Despite making these points on several occasions to Safe Work Australia, CropLife is disappointed that no provision has been made in the Bill to accommodate the industry's concerns. While CropLife welcomes national harmonisation of workplace health and safety regulation, it would be disappointing if this were to occur at the expense of inconsistency between the Bill and existing APVMA labelling legislation.