

## Submission to the Senate

**From:** Jeff Simpson  
Chemical Management & Regulatory Consultant, Editor & Publisher  
Haztech Environmental ABN: 27 630 291 348

**Website:** [www.haztech.com.au](http://www.haztech.com.au)

**Date:** 21<sup>st</sup> Jan 2021

**To:** Committee Secretary, Senate Standing Committees on Environment and Communications  
Department of the Senate  
Parliament House CANBERRA ACT 2600

**Email:** [ec.sen@aph.gov.au](mailto:ec.sen@aph.gov.au) phone: +61 2 6277 3526

**Background:** In my Haztech Environmental consultancy I include - Chemical Hazard Classifications done & reviewed. SDSs prepared & reviewed. Labels prepared & reviewed. Chemical Management & Safety Regulatory Advice & Compliance: checked for AICIS, APVMA, FSANZ, TGA; prepared & reviewed for Dangerous Goods & Combustible Liquids, GHS Hazardous Chemicals / Hazardous Substances, Environmentally Hazardous Chemicals, Scheduled Poisons, and other Chemical and Physical Hazards e.g. for Reactivity and Dust Explosion hazards.

I have edited and published a chemical management newsletter for industry and authorities five times a year since 1995 called "Hazmat & Environment Notes" which I started in 1985.

I convene and co-convene two chemical management networking discussion groups.

Bimonthly Dangerous Goods Advisory Group and the Chemical Hazard Communication Network, which as both Discussion / Chat meetings. For details see: [www.haztech.com.au](http://www.haztech.com.au)

**Comment:** The Industrial Chemicals Environmental Management (Register) Bill 2020 does **not** put in place a system that will "minimise risks to the environment from industrial chemicals"

*In particular the (Register) Bill 2020 (3) The objects of this Act in (a) are not achieved "to give effect to an intergovernmental scheme involving the Commonwealth and the States that relates to the establishment of nationally consistent standards to minimise risks to the environment from industrial chemicals;"*

**Problem 1:** The Register can only be acted on once State and Territories also agree to the Register.

**Problem 2:** The Bill does not include any requirements to alert those using environmentally hazardous industrial chemicals to their hazards!!

**Action Needed:** We need the Bill to be extended to implement classifying and labelling of environmentally hazardous chemicals and the requirement for SDSs to include this information as soon as possible for all importers and manufacturers of chemical products, so that purchasers, users, and persons disposing of waste chemicals can be alerted to the environmental hazards and choose then manage these products to minimise the risks of environmental problems.

Yours sincerely

Jeff Simpson

Chemical Management & Regulatory Consultant, Editor & Publisher