



Food Intolerance Network

Coordinator: Sue Dengate

PO Box 718 Woolgoolga NSW 2456 phone 02 6654 9544 fax 02 6654 9566

email: sdengate@ozemail.com.au website: www.fedupwithfoodadditives.info

30 June 2006

NICNAS Existing Chemicals Program Review
GPO Box 58
SYDNEY NSW 2000

Promoting Safer Chemical Use: Towards better regulation of chemicals in Australia

I wish to make a public submission to your review on behalf of our 3,800 members. We were informed late and indirectly of the existence of this Review and trust that our submission can still be accepted.

We understand that 80% of all industrial chemicals traded globally lack adequate health, safety and environmental information. We have seen the weak assessments done by NICNAS, for instance with flame retardants, that plaintively note that there is inadequate data and call at the end for more research, and then the chemical is released throughout our environment without any further intention of ever examining its impact.

This approach is unacceptable to our members, many of whom suffer from the harmful impacts of chemical exposure in many forms.

NICNAS needs to recognise that chemical exposure and any resultant chemical sensitisation is not limited to the occupational environment. Toxic exposures also take place in the home, the school, the outdoor environment, recreational pursuits and from personal care products and pharmaceuticals. For the majority of those people, solvents, pesticides and fragrances represent the most common source of exposure. Products we bring into our homes are full of harmful chemicals which we have no way of identifying as there is no mandatory labelling system in place.

Our Network seeks the following recommendations from your Review:

1. Legislation to establish a registration and assessment process for existing and new industrial chemicals in Australia. All chemicals must undergo stringent registration and risk assessment and the new legislation should prohibit the marketing of any chemical for which such basic health and environmental safety data have not been provided.

2. Powers under the Legislation to enable NICNAS to ban, phase-out, restrict and acquire information about chemicals and products from manufacturers. Manufacturers who are not forthcoming with new safety data or information about adverse health and environmental impacts of their chemicals/products should be liable for heavy penalties or have their products removed from the market.
3. A public time frame for review of all chemicals on the marketplace. Prioritisation for chemical review should be as follows:
 - known human allergens,
 - sensitisers,
 - neurotoxins
 - lipid soluble and found to build up in the environment and biological fluids of humans
 - carcinogens, mutagens and reproductive toxins
 - persistent bioaccumulative toxic substances
4. Enforceable labelling so that consumers are adequately informed when industrial chemicals are present in products they use or buy. For instance when clothing contains flame retardants or carpets contain pesticides, then the presence and type of flame retardant and/or pesticide must be provided so that the consumer can make an informed choice. Commercial secrets are unacceptable to consumers - especially those in 'at risk' populations. Legislative protection is essential to allow at risk groups to avoid unwanted exposures and adverse health consequences. It is reprehensible for products to contain hidden ingredients that can harm human health.
5. Enforcement of international standards on VOCs. As a Network we have many members with concerns about Multiple Chemical Sensitivity and autism. The increasing presence of volatile organic compounds in our homes, public places, food, personal care products and transport is an issue that requires monitoring and surveillance and, above all, enforcement. When, for instance, a new car is shown by CSIRO tests to contain VOCs at 100 times WHO recommended levels, action needs to be taken by NICNAS to inform consumers of the risk and to enforce standards on industry. In short, this is a public health issue that needs to be taken seriously, not underfunded and ignored.

Thank you for the opportunity to input the review.

Dr Howard Dengate FAICD