

22/02/2023

**RE: AICIS Proposed changes to the List of chemicals with high hazards for categorisation**

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being for all. PHAA seeks to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

PHAA appreciates the opportunity to respond to the public consultation on *Proposed changes to the List of chemicals with high hazards for categorisation & information on minor changes to the Guidelines*. However, given the breadth of the consultation and the number of chemicals included as part of the review, it has been untenable for us to complete a meaningful expert review of the additions to the *List* within the allotted one month for consultation.

In lieu of an extensive review of the proposed changes, PHAA supports the key actions of the Australian Industrial Chemicals Introduction Scheme, that is, to aid in the protection of human health and the environment including through:

- the regulation of the introduction of industrial chemicals;
- the assessment and evaluation of the introduction and use of certain industrial chemicals; and
- the provision of information and recommendations about managing the risks arising from the introduction and use of industrial chemicals.<sup>1</sup>

These actions must be carried out with proper independent expert processes and independent expert assessments free of industry interference, focused on achieving best possible public health and safety and environmental outcomes.

Although we are unable to provide specific commentary for this consultation, PHAA supports AICIS in making necessary changes that prioritise and further the protection of human and environmental and are supported by independent expert evidence and advice.

Yours Sincerely,



Adj. Professor Terry Slevin  
Chief Executive Officer  
Public Health Association of Australia

<sup>1</sup> *Industrial Chemicals Act 2019* (Cth) s 7.