Using AICIS approved chemical names for protecting confidentiality

On 25 October 2018 PHAA made the short submission set out below to a consultation on using AICIS approved chemical names by the National Industrial Chemicals Notification and Assessment Scheme (NICNAS), part of the Office of Chemical Safety, Australian Government Department of Health.


PHAA comments:

Introduction
The PHAA and other community groups remain concerned that the proposed AICIS draft rules may weaken the regulatory oversight for industrial chemicals and increase the threats for people and the environment.

Generic or masked chemical names for protecting confidentiality
The PHAA agrees that generic or masked names for industrial chemicals should provide an indication of the chemical class for indication of the level of possible reactivity and impact on people, animals or the environment. PHAA also supports the AICIS position that the minimum level of masking should be used, and that a strong case would be required by the introducer for more than one level of masking to protect its Confidential Business Information (CBI). The examples provided in the guidance will be very useful for introducers.

It is hoped that masked and generic names are used to protect CBI to encourage the introduction of new and safer chemicals, rather than to protect the identity of a relatively common chemical and profit margins from a competing importer.