Simplified Trade System Implementation Taskforce
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Dear Madam/Sir

Accord is pleased to provide the following submission to the Simplified Trade System (STS) Stakeholder Consultation Paper.

Introducing Accord

Accord is the peak national industry association representing the manufacturers and marketers of formulated hygiene, personal care and specialty products, their raw material suppliers, and service providers. Accord member companies make and/or market a broad range of consumer and commercial goods that play integral roles in safeguarding public health, promoting personal hygiene, boosting confidence and emotional wellbeing, maintaining comfortable homes and enhancing quality of life, as well as keeping the wheels of commerce and industry turning. Member companies include large global manufacturers as well as small dynamic Australian and family-owned businesses. A list of Accord member companies is available on our website: http://accord.asn.au/about/members.

The formulated hygiene, cosmetic, personal care and specialty products industry is a significant industry sector contributing to a prosperous Australian economy. Our industry's products include household and commercial cleaning agents; disinfectants; make-up and beauty products; toiletries and personal care products; hair-care products; skincare products, including sunscreens; oral hygiene; fragrances and perfumes, feminine hygiene products; industrial and agricultural sanitisers; household pest control; and adhesives and sealants.

Recognising the importance of this sector to the public health of the nation and its contribution to Australia's economy, Accord commissioned EY to prepare the first-ever *State of the Industry Economics Report for the Australian Hygiene, Personal Care and Specialty Products industry*[1]. This top-down economic report looks at the entire value of the industry across all market segments represented by Accord. It quantifies the key economic indicators for the industry, highlighting the economic importance of the entire hygiene, personal care and specialty products industry to Australia.

Here are some of the topline results, based on 2018 economic data:

- Total turnover: $26.3bn (17th largest industry sector in Australia!)
- Industry value-add: $5.6bn (upstream and downstream value added by our industry to the Australian economy—an indicator of how our sector drives economic activity)
- Jobs: 68,117
- Wages: $3.4bn
- Export value: $1.3bn.

The Report identified a number of other significant observations regarding our industry, including:

- Diversity in production, with businesses operating across all aspects of the supply chain from production through to the retail of final goods.
- Varied client base, with industry products consumed by a wide range of end-users and spanning a wide range of product types from basic consumer necessities to janitorial cleaning supplies to luxury cosmetics.

[1] Hygiene, Personal Care and Specialty Products industry: Economic State of the Industry report Accord Australia Ltd Final report15 October 2019: https://accord.asn.au/media-policy/

- Resilience to changes in economic conditions (likely arising from the above two characteristics).
- The higher growth in our industry's value-add than the Australian GDP over the past five years, meaning that our industry added proportionately more value than some other industries in the economy.

Reviewing red tape – impediments to seamless cross-border transactions

We welcome the aim of the STS Taskforce to deliver a meaningful reform by removing impediments to seamless cross-border transactions. This aim aligns with our industry's goal of achieving no unnecessary barriers to trade. Our industry has become somewhat cynical of proposed reforms over the years given former attempts by previous governments to reduce the regulatory burden and improve regulator performance has not delivered many tangible outcomes. Despite initially well-intentioned reform initiatives across many years, Accord member companies continue to be heavily and inefficiently regulated and are yet to see any meaningful and tangible results arising from the review efforts. Rather than resulting in improved regulatory outcomes for industry, our experience has been that most reform initiatives have increased rather than decreased the regulatory complexity our members face in their day-to-day business activities. However, we remain hopeful that the work of the STS Taskforce along with the Government's reinvigorated Deregulation Agenda will provide some meaningful reform.

In addition to general business regulation, at the Commonwealth level, Accord members are regulated by the Australian Industrial Chemicals Introduction Scheme (AICIS), the Therapeutic Goods Administration (TGA), the Australian Pesticides and Veterinary Medicines Authority (APVMA), the Australian Competition and Consumer Commission (ACCC), the National Measurement Institute (NMI), Biosecurity Australia, and Food Standards Australia New Zealand (FSANZ) and we are expecting additional regulations, Industrial Chemicals Environmental Management Scheme (IChEMS), to be implemented this year, after the passage of the Industrial Chemicals Environmental Management Register Act in March last year. At the state and territory level there is chemical scheduling for consumer goods, work health and safety including the storage and handling of hazardous chemicals, transportation of dangerous goods, environmental controls and inspections such as food audits for chemical residues. The emerging issues around waste, plastic packaging and other possible environmental impacts will also introduce much more uncertainty and if not approached in a proper proportionate manner could add considerably to the regulatory burden already on our sector.

Accordingly, we consider that we are well placed to speak on issues regarding improved opportunities for cross border trade and effective but more efficient regulation. Essentially, Accord's one overriding ask of Government is not for financial handouts, but for Governments to effectively 'move out of the way' of legitimate business and industry sectors by introducing much more efficient regulatory systems that are more compatible with international regulatory systems – to reduce red tape, reduce compliance costs, decrease the regulatory burden, and improve time to market.

The Government already has a number of underutilised instruments and policies which if implemented fully would be of significant benefit to industry. These are the Mutual Recognition Agreement (MRA) and Trans-Tasman Mutual Recognition Arrangement (TTMRA). These arrangements can be extremely valuable vehicles to reducing regulatory impediments to goods and services mobility across jurisdictions. In addition, the Government's Accepting trusted international standards policy is also an important vehicle designed to reduce regulatory duplication for goods already regulated by comparable authorities and deemed safe for use in those jurisdictions. It requires Australian regulators to have confidence in the decisions of those regulators and to allow those goods into Australia without further regulatory intervention.

Coverage, efficiency and effectiveness of MRA and TTMRA

There have been a number of periodic reviews of the MRA and TTMRA conducted by the Productivity Commission (PC). The last having been undertaken during 2014 and 2015 with the final research report and recommendations, *Mutual Recognition Schemes* published in September 2015[2]. Under the current arrangements there is a permanent exemption for the transport of dangerous goods and hazardous substances which includes industrial chemicals. In Accord's submission to the PC inquiry in 2014 we recommended that the permanent exemption be removed given the greater harmonisation in chemicals management and workplace health and safety by Australia and New Zealand.

In addition, both Australia and New Zealand are signatories to the work of the United Nations (UN) and have adopted the United Nations Recommendations on the Transport of Dangerous Goods - Model Regulations. The United Nations (UN) Sub-Committee of Experts on the Transport of Dangerous Goods (UNSCETDG) is responsible for the 'UN Recommendations on the Transport of Dangerous Goods—Model Regulations'. The UN Recommendations are internationally accepted as the principal technical standards underpinning the air and sea dangerous goods codes and are also used by many countries as the basis for their road and rail dangerous goods transport codes. Given this degree of harmonization domestically and with New Zealand, we asked what the valid reason could be for maintaining the exemption for the transportation of dangerous goods, and storage and handling of hazardous chemicals within the MRA and TTMRA. In its 2015 Research Report, the PC agreed with Accord's view:

> *The Commission's view*
> *The Commission has not received any evidence to suggest that the outcomes achieved by Australia and New Zealand's regulatory regimes for hazardous substances, industrial chemicals and dangerous goods substantially differ, or that mutual recognition of these goods would pose a real threat to public health and safety or the environment in either country. Furthermore, the recent policy developments in both Australia and New Zealand are likely to reduce the differences in the two countries' approaches, which should decrease the likelihood of significantly different outcomes.*
>
> *Given the reform processes currently underway, and because regulatory outcomes are unlikely to differ significantly, the Commission considers there is a case to pursue mutual recognition and remove the permanent exemption for hazardous substances, industrial chemicals and dangerous goods. However, regulatory cooperation between the two countries will be required to realise this, given the complexity of the schemes and the existence of some outstanding differences, such as in relation to environmental assessment and labelling of consumer products.*
>
> *Since the conversion of the special exemption to a permanent exemption, regulatory cooperation for hazardous substances, industrial chemicals and dangerous goods has been piecemeal. In some cases, most notably in relation to notification and assessment, regulatory cooperation appears to have lapsed completely (section 4.5).*
>
> *The reforms to NICNAS, the framework for environmental management of industrial chemicals in Australia, and the work health and safety regime in New Zealand, provide an opportunity to renew regulatory cooperation and expand the scope of mutual recognition. The NZ Government (sub. 47) supported the resumption of regulatory cooperation.*
>
> *Significant costs could result from ignoring trans Tasman regulatory cooperation in current ongoing reforms (chapter 7). A program of regulatory cooperation should commence immediately with the objective of removing the permanent exemption by end 2018 (by which point reforms to NZ's work health and safety regime and Australia's NICNAS will have been completed).*
>
> *RECOMMENDATION 4.2*
> *The Australian, State, Territory and NZ Governments should strengthen their collaborative efforts to streamline the regulation of hazardous substances, industrial chemicals and dangerous goods and work together in adopting risk based approaches. The TTMRA permanent exemption for these goods should then be removed by the end of 2018.*

[2] https://www.pc.gov.au/inquiries/completed/mutual-recognition-schemes/report

Disappointingly there has been no action on the part of Government to give effect to the PC's Recommendation 4.2. We believe that greater effort is required by regulators on both sides of the Tasman to overcome perceived obstacles regarding trade in chemicals.

Example 1 – regulation of transport of 'dangerous goods'

Transporting dangerous goods is not the core of any of our members' business; however, it is a necessary and unavoidable part of doing business. Some of the products that are manufactured or imported by our member companies such as alcohol-based hand sanitisers, perfumes, oven cleaners and aerosol products are classified as dangerous goods. These products are shipped through various supply-chains, including direct to end users including consumers, and through wholesaler to retailer, then to the final customer. Therefore, the movement of goods is to a large degree determined by the end user (what they want, how much they want, when they want) and any supply chain restrictions or disruptions.

There is scope to improve the implementation of national regulations for the road and rail transport of dangerous goods in Australia. While we note that Freight and Logistics is not within scope of the STS review, we nevertheless provide this as an example to the STS Taskforce as an area where significant benefits could be realised by industry if there was a seamless movement of goods across state and territory borders by removing the permanent exemption and thereby better utilisation of the provisions of the MRA and TTMRA. Attachment 1 of this submission provides a schematic of the complex Australian regulatory system. Currently clarification on acceptability of moving a package from one Australian State jurisdiction to another (let alone another Country) can involve interactions with two Commonwealth regulatory agencies, a National policy body and multiple State/Territory regulators.

It is our experience that the current regulatory framework for the transport of dangerous goods in Australia meets its primary purpose. However, it does so in a manner that is inefficient, with unnecessary negative impact on regulated entities.

This is perhaps not surprising noting that there is no overt recognition that regulation of the transport of dangerous goods should facilitate seamless movement of goods. There are also no overt statements with regard to efficiency, although we note that regulatory best practice should include this consideration.

It should be recognized that the transport of dangerous goods is necessary, and regulations should minimise negative impact on the movement of goods while preventing as far as possible, accidents to persons or property, damage to the environment, the means of transport employed or to other goods.

Our recent experiences with the COVID-19 pandemic has also further highlighted that the current system appears unable to readily respond to emergency situations due to fragmented regulatory responsibilities and unclear lines of accountability.

Example 2 – storage and handling of 'hazardous chemicals'

The PC 2008 Report noted the potential for interjurisdictional inconsistency under the model legislation. This is where the application of MRA would be of great benefit. We see no need for the storage and handling of dangerous goods to continue to be outside the scope of MRA and TTMRA since the signing of the Inter-Governmental Agreement for Regulatory and Operational Reform in Occupational Health and Safety by COAG. This marks a significant step forward towards the ultimate goal of a national workplace health and safety system which is fully integrated into a seamless national economy and further, to continue with the exception would be inconsistent with the current thrust of the Government's reform agenda.

Example 3 – industrial chemicals introduction

We bring into question why Australia requires such a complex scheme for managing introduction of all industrial chemicals, especially when these ingredients are included in imported formulated household products, regardless of toxicity of the ingredient or the toxicity of the formulated product.

New Zealand has a more pragmatic approach in the control of hazardous substances through a risk management approach without any detriment to environment, or public health and safety. There is no reason why new non-hazardous chemicals should not be exempt from assessment by AICIS and all hazardous industrial chemicals subject to TTMRA arrangements as both jurisdictions have agencies which undertake assessment of their hazardous properties. This is particularly relevant since the Government announced its policy on accepting trusted international standards.

The primary thrust of chemicals regulation is the protection of public health and the environment. Accord supports these important objectives. We endorse the need for efficient regulation that is set at the minimum effective level of intervention necessary to manage risks while at the same time promoting innovation and productivity through increased business activity.

Accord believes that the efficient and effective operations of the MRA and TTMRA can play a valuable role in eliminating unnecessary burdens which arise because of jurisdictional differences. The MRA and TTMRA can be highly effective tools which form a suite of government measures to eliminate costly and unnecessary duplication. This could be particularly effective in areas where there is limited cross border impact because of the small number of companies operating across more than one jurisdiction. For these areas of regulatory control, it may be simpler to mutually recognise individual jurisdictional regulatory controls rather than go down the time consuming and potential resource intensive path of harmonisation.

Also, a proportionate risk based chemical management system could enable the freer flow of non-hazardous or low regulatory concern chemicals across the Tasman. Similarly, an opportunity also arises to recognise certain low risk agvet products such as pet food additives within the scope of the TTMRA.

Accord suggests that the STS Taskforce give consideration to fully utilising the elements of the MRA and TTMRA and recommends that the Government give a commitment to implement Recommendation 4.2 of the 2015 PC research report, *Mutual Recognition Schemes*.

International harmonisation – full implementation of the Accepting trusted international standards policy

On 14 October 2014, the Government published the *Industry Innovation and Competitiveness Agenda: An Action Plan for a Stronger Australia*. The Agenda was warmly welcomed by industry which stated a new policy in relation to international standards and risk assessments:

> *To reduce duplicative domestic regulation, the Government will adopt the principle that if a system, service or product has been approved under a trusted overseas standard or risk assessment, then Australian regulators should not impose any additional requirements, unless there is a good and demonstrable reason to do so. This will reduce costs and delays for businesses, increase the supply of products into the Australian market and allow regulatory authorities to focus on higher priorities.*

Proper implementation of the Accepting trusted international standards policy has the potential to facilitate and increase in two-way trade by addressing non-tariff trade barriers. To date there has been poor take-up of this important policy initiative up by regulatory agencies, particularly for low-risk consumer goods. We note however that under the Government's Deregulation Agenda, the Treasury Department is undertaking consultation on the adoption of the policy for product safety standards under Australian Consumer Law. This is welcome but we note that the original policy was announced in 2014 and it is now 2022 – the transition from policy announcement to practical implementation has been extraordinarily slow, with no real practical beneficial impact on our sector as yet.

Accord believes that the opportunity exists to also adopt this policy for low-risk consumer goods, particularly where Australia has already entered in Free Trade Agreements with comparable economies which have advanced regulatory regimes such as the UK, USA, ASEAN and New Zealand and in the future, the EU.

Accord member products include a range of fast-moving consumer goods, cosmetic and personal care products and commercial cleaning products. Many of these are fully imported products from the UK, EU, USA, Canada, Japan and New Zealand and have already been subjected to a high level of regulatory scrutiny comparable to Australia's regulatory system for public health, environmental controls, consumer safety, product liability and consumer information.

While these products are generally recognised as consumer goods and/or low risk commercially formulated products by the public, their ingredients are regulated as industrial chemicals under Australian law. This is in addition to the consumer product regulation under the Australian Competition and Consumer Commission (ACCC) and chemical risk management regulation through chemical scheduling (implemented by State/Territory Health). A consumer product such as a shampoo, makeup or disinfecting cleaning product that is deemed safe for use in for example, the UK under its own legislation, will have to have further regulatory intervention when it arrives in Australia such as having its individual ingredients assessed for safety by Australia's industrial chemicals regulator rather than relying on the overall risk profile of the product which is deemed safe for public use. This is in direct contradiction with the intent of the Australian Government policy to enable these products already deemed safe by a comparable regulator to have a more streamlined approach when accessing the Australian market.

Consumer behaviour is driving demand for the same products available overseas to be available in Australia at the same time. One of the biggest barriers to this currently is the regulatory burden of complying with industrial chemicals requirements, which often makes the introduction of a product containing a "new" (to Australia) chemical, not financially feasible. Where this prevents a company from introducing a product or range of products into Australia, consumers will simply purchase the product online from an international supplier to the detriment of Australian businesses.

Multinational companies are working more and more with global product offerings where the same products are available throughout the world. For example, Australia currently represents around 1.3% of the global cosmetics market. The potential return on investment from a market this size is simply not viable to warrant the considerable investment that is needed to meet Australian specific requirements.

We have several examples from our members where "global" product launches have become *global – except Australia* due to the high regulatory burden of introducing a new chemical that is not on the Australian Inventory of Industrial Chemicals (Inventory) in volumes sufficient to meet the demand of Australian consumers. These are products that are compliant with the regulatory systems of our major trading partners and freely available to millions of consumers around the world.

This is similarly the case for raw material suppliers that wish to introduce "new" chemicals that are otherwise available to product formulators and manufacturers internationally. For such a small part of the global market, these companies are not necessarily always prepared to meet additional Australian requirements or significant additional re-assessment costs.

Our industry functions effectively as a 'healthy ecosystem' of local and global companies, manufacturers and importers, and of course exporters of Australian-made product. And technology-based industries like ours need ready access to the latest global innovations in ingredients and products. Local manufacturers cannot expect to be globally competitive if they are cut off from sources of innovation and know-how or have no incentive to keep up with the latest product innovations.

The regulation of cosmetic and personal care products in Australia is particularly complex and multilayered. Cosmetic product ingredients are regulated as industrial chemicals and the products are regulated under Australian Consumer Law for product safety, ingredient labelling, product liability, and false and deceptive conduct. Products are also regulated under the Poison's Standard, trade measurement requirements and dangerous goods legislation. When the industrial chemicals legislation was reviewed in 2012 resulting in the *Industrial Chemicals Act 2019*, an opportunity existed to harmonise the regulation of cosmetic ingredients and products with those of comparable economies and our major trading partners. However, this did not eventuate, and Australia maintains a unique, high regulatory barrier framework for these low-risk products. We note that the regulator has adopted some of the same international processes, however in a manner that increased the regulatory burden without decreasing trade barrier e.g. incorporation of the use of EU IUCLID database into Australian regulations without relevant rollout or training to the Australian regulated entities, and without accepting the EU assessment outcomes.

An important element of the new Scheme was the introduction of mechanisms to enable the implementation of the Australian Government's Accepting trusted international standards policy. AICIS has made some effort to use components of assessments from comparable international regulators, but the Scheme is still unique in its assessment of ingredients compared to comparable advanced economies and its risk tolerance is extremely low. For example, regulatory intervention begins for substances introduced at volumes of 10 kilograms, even when imported in formulated consumer products that are not hazardous. In the equivalent EU regulatory scheme, intervention commences at 1000 kilos and does not apply to ingredients imported in formulated consumer products, unless they are identified as Substances of Very High Concern.

This often means that extensive environmental or public health data on individual substances as required by AICIS is not available since these substances are generally regarded as safe by comparable jurisdictions. Importing companies or manufacturers are required to undertake additional testing to meet the data requirements for entry into Australia even though the volumes may be very small, for example as is the case for fragrance ingredients. Internationally, fragrance ingredients are controlled through an industry code, which is generally accepted by most regulators globally, but not in Australia. This is particularly evident for substances imported in formulated products where the importer is required to disaggregate the products by ingredient and then add the volumes up to see where the individual substances fit within the AICIS risk categorisation. Yet these are fully imported consumer goods generally deemed safe by comparable advanced economies with equivalent regulatory systems.

Prior to the reform of industrial chemicals, the International Nomenclature of Cosmetic Ingredients (INCI) was able to be used to identify cosmetic ingredients for industrial chemical purposes. INCI is an international coding system to designate the ingredients used in cosmetic products recognised and adopted worldwide. INCI provides a uniform, scientifically based ingredient nomenclature that is recognised by regulatory bodies, consumers and health-care providers throughout the world. INCI is recognised for regulatory purposes by the Therapeutic Goods Administration (TGA) and the Australian Competition and Consumer Commission (ACCC) but not the Australia's industrial chemicals' regulator, AICIS. Despite being three quarters of the way through a two-year transition time, AICIS is still considering Accord's long-standing recommendation that INCI names be accepted as a 'proper name' for regulatory purposes. If AICIS decides not to accept INCI names, and does not provide another solution for naming chemicals where there are no known or widely used names other than INCI names, business will be required to apply to the Chemical Abstract Service (CAS), a paid for commercial service, to assign a name for regulatory purposes. This will be an additional unnecessary cost and time burden on the regulated sector.

In recognition of the global trade in cosmetic and personal care products, an international collaboration of national cosmetic industry associations has emerged with trade liberalisation as one of its key objectives. The success of industry working together to achieve regulatory cooperation is demonstrated by the success of the Trans-Pacific Partnership (TPP) with the inclusion of an Annex on

cosmetic products (Annex 8.D Cosmetics). The TPP is the first trade agreement to promote regulatory convergence and address technical barriers to trade that impede the personal care products sector. The TPP Cosmetic Annex provides an important framework for international regulatory best practice and promotes a stronger global personal care products industry. A cosmetic annex has been adopted for use in the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP) CTPP and the AU/UK FTA. While the existence of a cosmetic annex is important and recognises the importance of this sector it appears to have done little to encourage the local regulator to consider utilising the Government's trusted international standards policy more fully and in a way which assists industry and consumer alike.

Standards Australia through its International team is currently working on a project under the ASEAN-Australia-New Zealand Free Trade Agreement implementation, via the Sub-Committee on Standards, Technical Regulations and Conformity Assessment Procedures, focused on cooperation in International Standards for the cosmetics sector.

The project has two key objectives:

- Strengthen information exchange and collaboration between AANZFTA Parties on standards, technical regulations and conformity assessment procedures to identify opportunities that facilitate international standards development in Cosmetics, and
- Develop recommendations for the development, adoption and use of international standards in Cosmetics, enhancing market access and regional trade opportunities.

The initial report has identified that the Australian system is unique compared to AANZFTA Parties. Opportunities exist for Australian industry to pursue greater harmonisation and regulatory alignment through this project.

One of the key steps that should be taken to address trade barriers is to slow and ideally prevent the creation of new trade barriers. It is our experience that when regulators consult on new or amended technical requirements, trade facilitation is rarely considered properly e.g. the introduction to the consultation may state that the aim is international alignment, but the content of the consultation proposes regulations that introduce increased regulatory divergences. At the same time as preparing this submission, Accord is compiling comments to the TGA on proposed mandatory requirements and technical guidance that significantly increases technical regulatory requirement on sunscreen ingredients and products that will create further trade barriers. While we have provided the TGA as an example here, we note that this is simply due to the coinciding consultation timeframes. In our experience, almost any Australian regulator/product could be substituted in this example. Generally speaking, even when the consultation to create new regulation acknowledges that a technical barrier to trade is being created, the divergent requirements are often still justified as necessary, without an explanation as to why they are only necessary in Australia. The consideration of simplifying trade with other economies must first address the ease with which regulators create new divergent regulatory requirements, especially when the requirements are technical e.g. test methodologies.

Accord's aim is to ensure that no additional unique Australian requirements are imposed on our members' products, or their component ingredients, without thorough and rigorous justification. Mutual recognition of industrial chemicals and formulated products allows both importing and exporting economies to maintain their own regulatory systems but removes the need for industry to comply with two sets of rules and provides for higher certainty for industry while reducing technical barriers to trade and lowering regulatory costs.

Enabling timely access to "new" chemical ingredients already approved and in use in advanced economies with greater research facilities rather than requiring retesting and/or reassessment at the Australian border will improve the competitiveness of Australian industry, particularly as we look for more export opportunities. This will provide quicker access to new and innovative ingredients already

in use by our major trading partners and globally available and enable Australian businesses to engage on a more equal footing with our competitors by providing easier access to innovative ingredients and raw materials for advanced manufacturing.

Exposing our economies to international competition adds value to our economy by expanding the range of goods and services and placing downward pressure on costs. When we remove barriers to trade, we increase our purchasing power.

Concluding comments

Accord believes there is much to be gained for industry by making cross-border trade cheaper, faster and less complicated. We wish the STS Taskforce well in its deliberations and make the following recommendations:

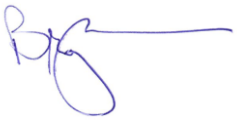
1. Accord suggests that the STS Taskforce give consideration to fully utilising the elements of the MRA and TTMRA and recommends that the Government give a commitment to implement Recommendation 4.2 of the 2015 PC research report, Mutual Recognition Schemes.
2. Under the Government's Deregulation Agenda, that as a matter of priority, further work be undertaken to recognise the importation of low-risk consumer goods under the Accepting trusted international standards policy and remove regulatory intervention by the industrial chemicals regulator.
3. The STS Taskforce should consider methods to slow, and ideally prevent the creation of new technical barriers to trade.

We look forward to working with the STS Taskforce and Government on furthering this important work.

The contact officer for this matter is Ms Catherine Oh, Accord's Director Regulatory & Supply Chain Strategy. Please do not hesitate to contact her on +61418513968 or coh@accord.asn.au should you require further clarification on the points raised.

Yours sincerely

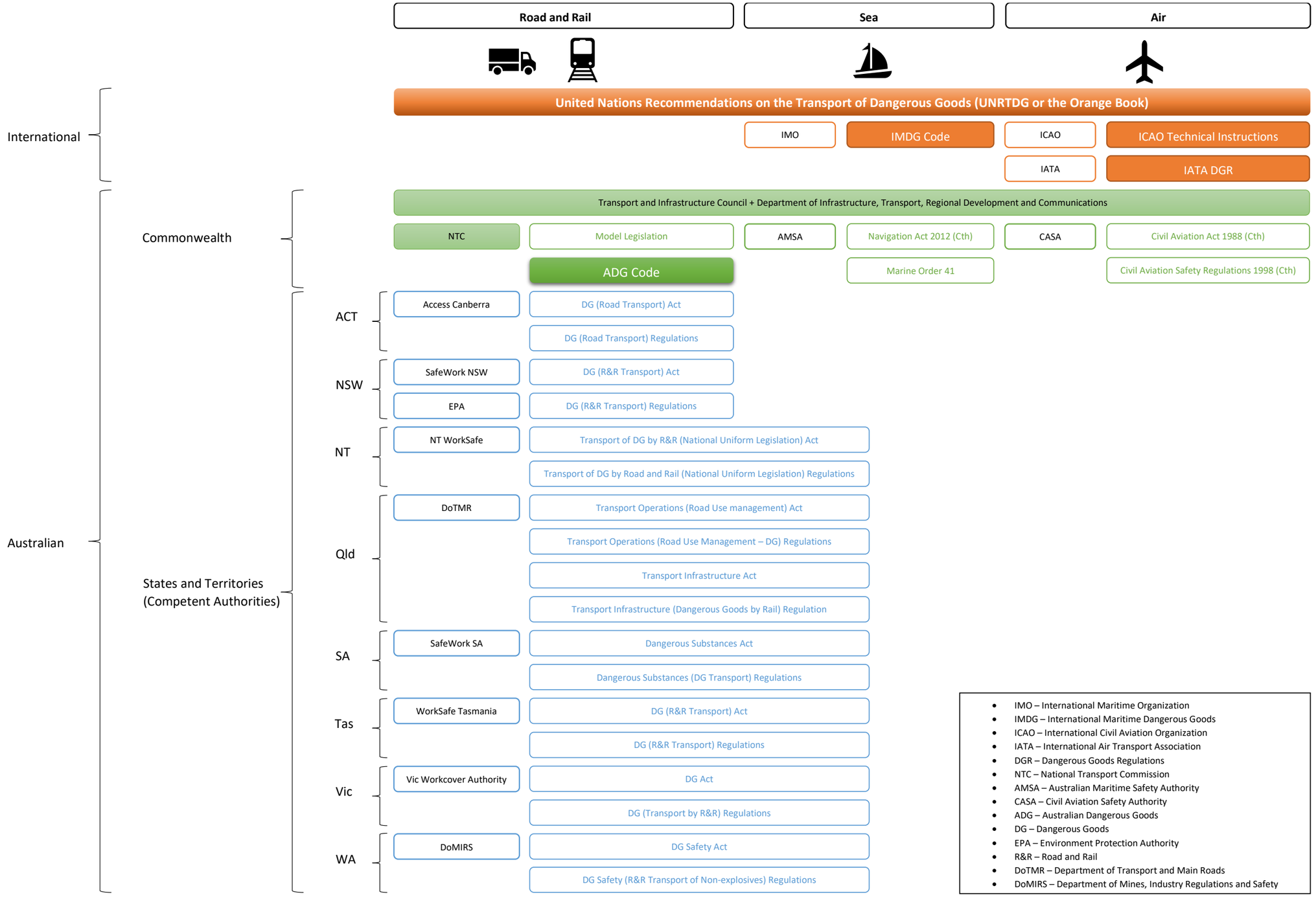
Authorised for electronic submission



Bronwyn Capanna
Executive Director

14 January 2022

Attachment 1



- IMO – International Maritime Organization
- IMDG – International Maritime Dangerous Goods
- ICAO – International Civil Aviation Organization
- IATA – International Air Transport Association
- DGR – Dangerous Goods Regulations
- NTC – National Transport Commission
- AMSA – Australian Maritime Safety Authority
- CASA – Civil Aviation Safety Authority
- ADG – Australian Dangerous Goods
- DG – Dangerous Goods
- EPA – Environment Protection Authority
- R&R – Road and Rail
- DoTMR – Department of Transport and Main Roads
- DoMIRS – Department of Mines, Industry Regulations and Safety