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Other

A comment regarding Regulation 330 of the Model regulations, and the related Schedule 7(1c). We believe that the requirement of Schedule 7(1c) (requirement of SDS to contain the Australian address of the importer), does not improve the efficacy of a safety data sheet to meet its purpose, stated in the SWA Code of Practice as to provide “information on the properties of hazardous chemicals, how they affect health and safety in the workplace and on how to manage the hazardous chemicals in the workplace”. For an importer without an Australian business address this regulation is difficult to comply with. Many companies would be affected due to the global supply market, where a company does not have a physical presence in Australia but does import a product requiring a safety data sheet to be supplied. It is easy to contact a supplier that is not based in Australia, either by electronic communication or telephone. As long as a free-to-call 24 hour emergency contact number is provided in the safety data sheet, and the importing entity is appropriately identified, the intent of the safety data sheet should be accepted as met.