



Voice of the Australian  
chemistry industry

13 November 2015

Major Hazards Advisory Committee  
c/- Planning Panels Victoria  
Level 5, 1 Spring Street  
MELBOURNE 3000

[planning.panels@delwp.vic.au](mailto:planning.panels@delwp.vic.au)

Dear Sir/Madam,

Re: Major Hazard Facilities Advisory Committee

PACIA appreciates the opportunity to provide initial comments on the matters raised in the Terms of Reference for the Major Hazards Facilities Advisory Committee (MHFAC).

The Australian chemicals and plastics industry is the **second largest manufacturing sector** in Australia. Our industry **employs more than 60,000 people**, with every job also creating five more in related supply chains. The industry **contributes \$11.6 billion** to gross domestic product, and **supplies inputs to 112 of Australia's 114 industries**. PACIA is the peak national body representing companies large and small across the chemicals and plastics supply chain.

This industry is an essential building block for Australia's modern economy. However the industry faces significant roadblocks threatening its future growth and its critical contribution to Australia. Action is needed to halt contraction and reposition the industry as strong, resilient and able to add significantly more value to the Australian economy.

PACIA is committed to working with all levels of Government and other stakeholders to achieve these outcomes. Currently regulatory and institutional barriers impinge upon the capacity of the industry to innovate, invest and grow. PACIA and our members, many of who are recognised as Major Hazard Facilities, are keen to work with this committee to ensure that any potential overlap with other policy or regulatory regimes is avoided and that the outcomes of this committee result in constructive and useful initiatives for our industry.

As you would be aware, Major Hazard Facilities (MHF) are determined and controlled under a complex and rigorous set of regulations. Achieving a license to operate as a MHF takes a dedicated approach to risk assessment and the establishment of the controls required. It must be ensured that this MHFAC has knowledge of this legislation and access to appropriate expertise on how this legislation operates. PACIA assumes that MHFAC would seek this expertise from both industry and Worksafe Victoria who administer the legislation.

PACIA is concerned at the tight timelines that have been established for this committee. There has been little consultation with industry on the establishment of this committee, the selection of its members or the agreed outcomes. There is very limited time for both the preparation of the discussion paper by the committee and for the public comment on the paper. The issues to be addressed are intricate and will require considerable consideration and debate. The potential for public comment to be held over the Christmas and New Year period, when industry is less likely to be operating and fully manned, appears great. PACIA would suggest that these timelines be reviewed.

PACIA looks forward to working with this committee in the near future and would be happy to facilitate the consultation between chemistry industry and the committee.

My contact details are below if you require any further information.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'K. Walton', with a stylized flourish at the end.

**Kathryn Walton**  
**Regulatory Policy Manager**

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