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Navigating public health chemicals policy in Australia: a policy maker's and practitioner's guide

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Abstract: Chemicals are ubiquitous in everyday life. Environmental health practitioners rely on a complex web of regulators and policy bodies to ensure the protection of public health, yet few understand the full extent of this web. A lack of understanding can hamper public health response and impede policy development. In this paper we map the public health chemicals policy landscape in Australia and conclude that an understanding of this system is essential for effective environmental health responses and policy development.

There are over 39 000 chemicals on the world market today,¹ with the potential for this number to increase significantly through new manufacturing techniques such as nanotechnologies. These chemicals are widespread, occurring in everything from the food we eat, to the clothes we wear, to the cars we drive. The regulation of an item that permeates through every facet of our lives is by its nature complex. This complexity is difficult to navigate, particularly when public health practitioners are faced with an adverse health effect from a chemical product.² Knowledge of the range of

chemical regulators and policy bodies allows for proper engagement with the system.

In an attempt to prevent adverse health effects occurring governments produce policies designed to minimise the exposure of the population to chemicals. Environmental health practitioners are often called upon to design or review these policies for the protection of the public's health, but without having a fundamental understanding of the regulators who can enact this protection it is difficult to ensure the policy developed will be effective and functional.

The following describes the complex web of regulators and policy makers in Australia that underpins the development of comprehensive, well-informed chemicals policy and appropriate practitioner response.

Making the chemical policy web

The current fragmented system of chemical regulation in Australia grew out of Australian federalism. In 1901 the Australian Constitution assigned a limited list of powers to the Commonwealth Government. The regulation of chemicals was not among them, leading to each state developing a unique approach to chemical issues and fragmenting chemical issues across different portfolios.³

The rise of the environmental movement in the 1960s and 1970s saw the establishment of the first state-based environmental protection agencies and national ministerial councils. Strong nationalisation of chemical policy issues in the form of targeted ministerial councils and national regulators only emerged in the 1990s out of the Hawke Government's 'New Federalism' and attempts to develop national regulatory strategies through the Council of Australian Governments (COAG). This period saw the establishment of national regulators in agricultural and

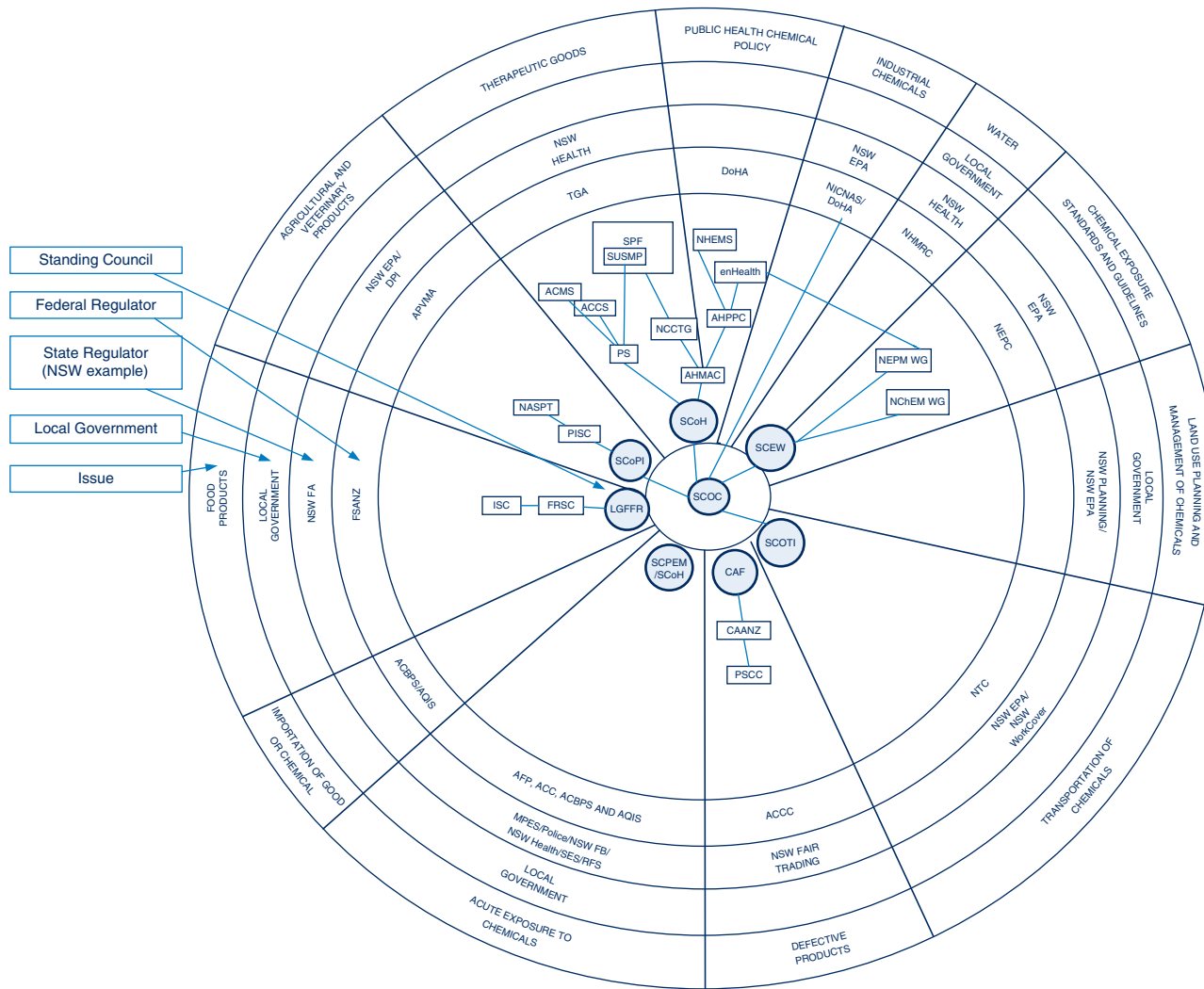


Figure 1. The web of government bodies responsible for public health chemicals regulation and policy in Australia.
See Table 2 for a list of acronyms used in this figure.

veterinary medicines, therapeutic goods, food, industrial chemicals, as well as various other agencies and ministerial councils. However, since much of the legislative power to implement and monitor controls rests with the states and territories, these agencies were limited in their ability to impose national uniformity of policy.

A third wave of reform began in 2005 with the then Prime Minister's direction to reduce unnecessary regulatory burden on business.⁴ COAG set about establishing a high-level taskforce to develop an integrated, national chemicals policy. The main aim of these reforms was to develop uniform regulation between states on chemical issues. These reforms are ongoing and while they are designed to develop uniformity within areas of chemical regulation (such as therapeutics), there is limited development of uniformity between areas of chemical regulation.

Current structure of chemicals policy

The current structure of public health chemicals policy in Australia remains highly fragmented with 12 distinct

segments (Figure 1). Some correspond to industrial sectors: therapeutic goods, agricultural and veterinary products, food products and a general category of industrial chemicals. Others developed out of responses to distinct regulatory problems: defective products, exposure standards, acute exposure, transportation of chemicals, land use planning, water, importation and public health policy.

Tables 1a and 1b stratify 10 of these areas with their agencies and functions at federal and state level. Table 2 provides a list of acronyms used in this paper.

Chemicals policy in Australia has the Standing Committee on Chemicals (SCOC) at its centre (Figure 1). The SCOC consists of representatives from the various standing councils and federal government agencies. It heads a regulatory hierarchy in each segment led by a standing council of federal and state ministers, which works towards more uniform national policy responses.⁵ These standing councils are generally supported by committees of senior state and federal bureaucrats and any federal government

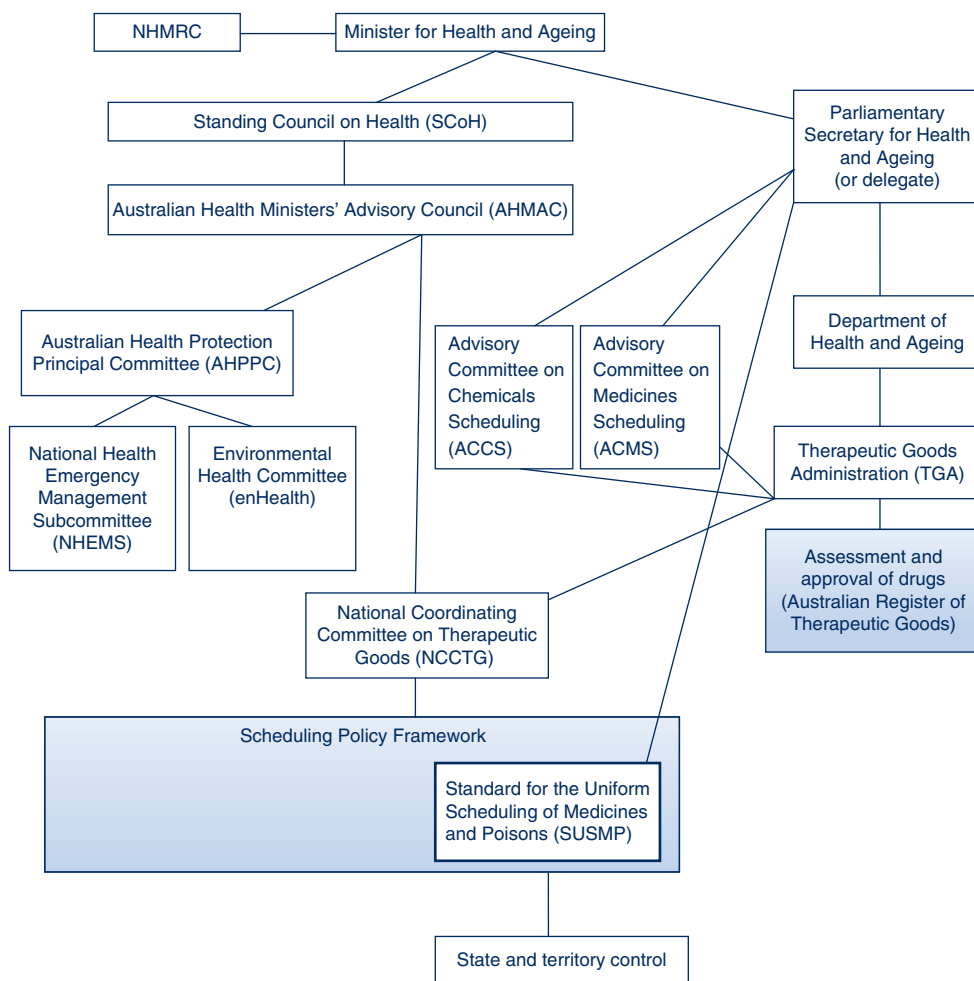


Figure 2. Government bodies responsible for therapeutic goods and public health chemicals in Australia.

NHMRC: National Health and Medical Research Council.

agencies with regulatory responsibility for the area of chemicals policy in question.

Segmented areas of chemicals regulation and policy

Therapeutic products, emergency management and public health chemical policy: the Standing Council on Health and the Therapeutic Goods Administration

The ministerial Standing Council on Health (SCoH) provides overall leadership in the regulation of therapeutic goods and public health issues arising from chemicals (Figure 2), drawing advice from the Australian Health Ministers' Advisory Council (AHMAC). For public health policy the AHMAC take advice from six key subcommittees, of which the Australian Health Protection Principal Committee (AHPPC) is the most important in terms of chemicals policy. The AHPPC includes federal and state Chief Medical/Health Officers, with representatives from other technical agencies, and provides advice and makes recommendations regarding environmental health policy and environmental threats and emergencies. It draws this advice from the Environmental Health Committee

(enHealth) and the National Health Emergency Management Subcommittee (NHEMS).

The National Coordinating Committee on Therapeutic Goods (NCCTG), a sub-committee of AHMAC, has overall responsibility for the Scheduling Policy Framework (SPF), a framework that sets out the national system for applying access restrictions on all poisons (including therapeutics) that pose a potential risk to public health and safety.⁶ Chemicals are 'scheduled' according to the degree of risk and the level of control required to protect consumers. A chemical may be referred to one of two committees to determine at what level it is to be scheduled – the Advisory Committee on Medicines Scheduling (ACMS) and the Advisory Committee on Chemicals Scheduling (ACCS). These committees provide advice to the Commonwealth Parliamentary Secretary for Health and Ageing (PS) (or their delegate), who has the final decision regarding the scheduling of the chemical in question;⁷ this decision will be made after extensive public consultation. A record of this decision is included in the Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP). Each state then

develops its own regulations around purchasing, packaging, labelling and enforcement of the SUSMP.

Products for which therapeutic claims are made are regulated by the Therapeutic Goods Administration (TGA) and associated state government agencies. The TGA assesses therapeutic goods for listing or registration on the Australian Register of Therapeutic Goods (ARTG), undertakes monitoring activities, and provides technical and administrative support to those committees involved in the scheduling of chemicals.

Agricultural and veterinary products: the Standing Council on Primary Industries and the Australian Pesticides and Veterinary Medicines Authority

The regulation of agricultural and veterinary chemicals follows a similar model (Figure 3) with the ministerial Standing Council on Primary Industries (SCoPI) developing policy and direction for the national regulator, the Australian Pesticides and Veterinary Medicines Authority (APVMA).

The SCoPI is supported by the Primary Industries Standing Committee (PISC). Sitting under the PISC is the National Agvet System Policy Taskforce (NASPT) which is tasked with developing a new national framework for the regulation of agricultural and veterinary chemicals.

The APVMA is the regulator responsible for the assessment and registration of agricultural and veterinary chemical products in Australia. Through the National Registration Scheme the APVMA registers and regulates the manufacture and supply of all pesticides and veterinary medicines used in Australia, up to the point of retail sale.

The APVMA also assesses agricultural and veterinary chemicals or products for potential impacts on human health, the environment, trade and efficacy.

The APVMA contracts the Office of Chemical Safety (OCS) in the Department of Health and Ageing to undertake public health assessments. As part of this assessment, the product may also be classified as a poison, at which point the product is referred to either the ACMS or ACCS for scheduling. The APVMA will set Maximum Residual Levels. These are the highest concentrations of agricultural and veterinary chemical residues permitted in food or animal feed and are set ensuring consumption of foods with these residues does not constitute an undue hazard to human health. The APVMA approves the labelling of a product. They also have the power to refuse an application if they are not satisfied that the product will not be harmful to human beings, and may also put conditions on its manufacture and supply.⁸ The APVMA also run a Chemical Review Program and an Adverse Experience Reporting Program.

The control of use of pesticides and veterinary medicines beyond the point of retail sale is the responsibility of state and territory governments (Table 1a).

Food products: the Legislative and Governance Forum on Food Regulation and Food Standards Australia New Zealand

The Legislative and Governance Forum on Food Regulation (LGFFR) is responsible for the development of domestic regulatory policies for food and the development of domestic policy guidelines for setting food standards (Figure 4).

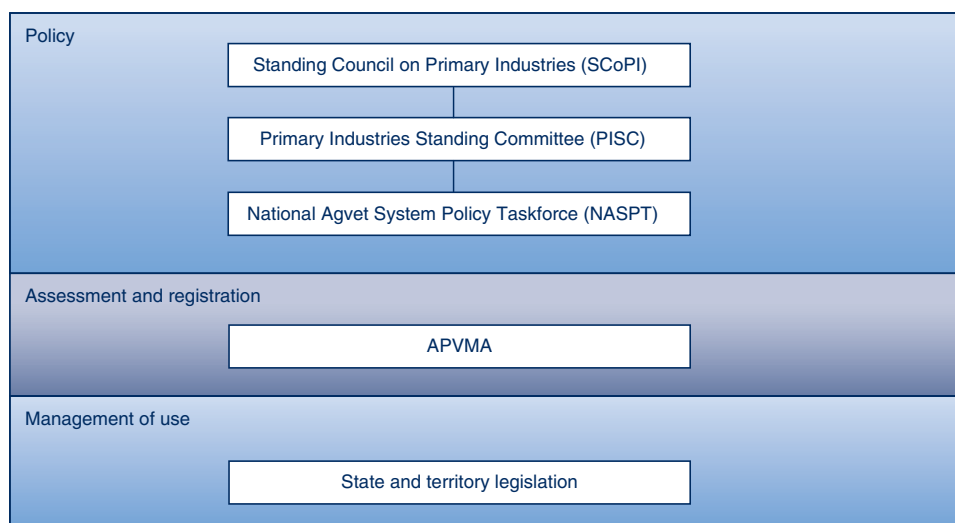


Figure 3. Government bodies responsible for agricultural and veterinary products in Australia.

Agvet: agricultural and veterinary.

APVMA: Australian Pesticides and Veterinary Medicines Authority.

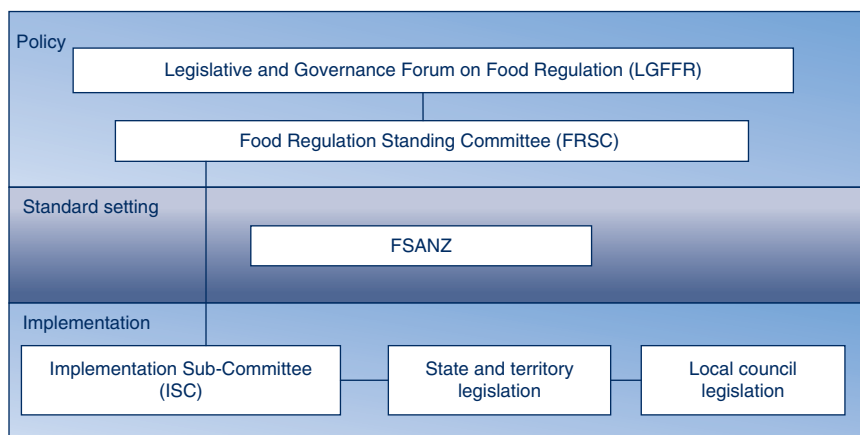


Figure 4. Government bodies responsible for food products in Australia.

FSANZ: Food Standards Australia New Zealand.

Under the LGFFR is the Food Regulation Standing Committee (FRSC) which is responsible for coordinating policy advice to the LGFFR.

Sitting below the FRSC is the Implementation Sub-Committee (ISC) which develops and supervises the implementation and enforcement of food regulations and standards across the jurisdictions.

Food Standards Australia New Zealand (FSANZ) is the national food regulator responsible for developing and maintaining the Food Standards Code and ensuring the protection of public health and safety around food issues. The Food Standards Code regulates the use of ingredients, the composition of some foods, and the presence of contaminants from food contact materials and environmental sources. FSANZ is also responsible for the labelling of both packaged and unpackaged food. It sets maximum levels for chemicals in food, which includes incorporating pesticide Maximum Residual Levels set by APVMA into food law.

In developing or reviewing any food regulatory measures, FSANZ must have regard to any policy guidelines set by the LGFFR. The implementation and enforcement of the Foods Standards Code is the responsibility of the ISC, and state and local governments.

Defective products: Legislative and Governance Forum on Consumer Affairs and the Australian Competition and Consumer Commission

Policy direction around consumer protection stems from the Legislative and Governance Forum on Consumer Affairs (CAF), the ministerial council of federal and state ministers for consumer affairs (Figure 5). Under the CAF sits Consumer Affairs Australia New Zealand (CAANZ), consisting of heads of state and federal consumer affairs departments. In turn, the CAANZ receives policy advice from three advisory committees and the Product Safety Consultative Committee (PSCC). The PSCC provides



Figure 5. Government bodies responsible for defective products in Australia.

ACCC: Australian Competition and Consumer Commission.

advice and recommendations on product safety specific policy, education and compliance matters. It also provides advice to the Australian Competition and Consumer Commission (ACCC) on proposed product safety regulations, bans, standards and responses to emerging issues.⁹

The ACCC is the national regulator of consumer products and administers the *Commonwealth Competition and Consumer Act 2010*. This Act sets out the Australian Consumer Law.

The powers that the ACCC has over product safety are of most relevance here. Under the Act the Assistant Treasurer has powers to recall or ban products that do not meet certain standards, are defective, or create an imminent risk of death, serious illness or serious injury. The ACCC can undertake assessments of the chemical hazards in products, which may be in conjunction with the National Industrial Chemicals Notification and Assessment Scheme (NICNAS).

The Australian Consumer Law is designed to create a consistent approach to the banning or recalling of products in Australia. As such, state and territory governments are limited in their approaches to recall or ban a product, which will occur at the national level. State and territories have the ability to impose interim bans and consult with the national regulator about product safety issues.

Industrial chemicals: National Industrial Chemicals Notification and Assessment Scheme

Industrial chemicals has developed as a residual category. If a chemical does not fit into any other Australian regulatory scheme, it will fall under the Industrial Chemicals portfolio. As such, the Department of Health and Ageing, of which NICNAS is a part, has representation on the SCOC.

NICNAS is the Australian regulator of industrial chemicals. It undertakes assessment of all new industrial chemicals on the Australian market and is also considering the assessment of over 38 000 existing chemicals on the Australian Inventory of Chemical Substances, which may not have undergone assessment under modern guidelines, through the Inventory Multi-tiered Assessment and Prioritisation Program.¹⁰ NICNAS also provides advice to other agencies regarding individual chemical contamination of products, and maintains strong links with the ACCC in this regard.

Although NICNAS has no authority to ban or phase out a chemical, it does have the power to prescribe conditions of use of a chemical which can be adopted and implemented through relevant state and territory legislation; it may also make recommendations to the PS for referral to the ACCS for inclusion of the chemical on the SUSMP.

Environmental health chemicals policy and chemical exposure standards: the Standing Council on Environment and Water and the National Environment Protection Council

The Standing Council on Environment and Water (SCEW) addresses broad national policy issues relating to environmental management and protection. Incorporated within the SCEW is the National Environment Protection Council

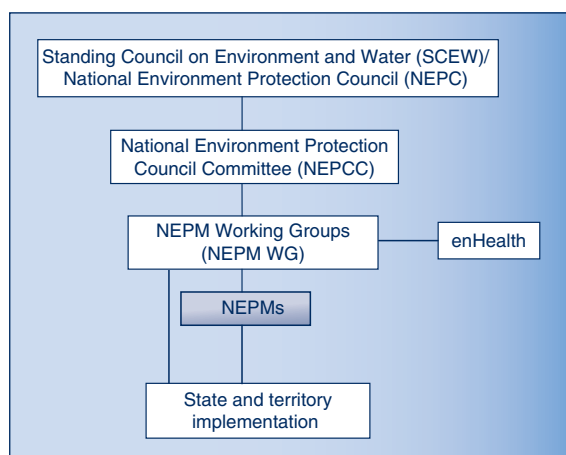


Figure 6. Government bodies responsible for the development of National Environment Protection Measures (NEPMs) in Australia.

enHealth: Environmental Health Committee.

(NEPC), a statutory ministerial council that has the power to create National Environment Protection Measures (NEPMs). NEPMs are broad framework-setting statutory instruments that may consist of goals, standards, protocols and guidelines. They provide guidance on issues such as air and water quality, land contamination and hazardous waste. State and federal health agencies also have an active role in the development of NEPMs through enHealth which has membership on the various NEPM Working Groups (NEPM WG).¹¹ State and territory governments have agreed to implement the NEPMs within their jurisdictions.

Importation regulation: Australian Quarantine and Inspection Service and Australian Customs and Border Protection Service

The Australian Quarantine and Inspection Service (AQIS) administer the Imported Food Inspection Scheme. Under this scheme, food is inspected according to the level of risk it may pose to the population as determined by FSANZ. Testing may include targeted hazardous contaminants, pesticides and antibiotics, microbiological contaminants, natural toxicants, metal contaminants and food additives.¹² In addition to the routine testing of imported food, AQIS conducts survey testing of imported food. It receives this direction from the ISC.

The powers of the Australian Customs and Border Protection Service (ACBPS) stem from the Commonwealth *Customs Act 1901*, the Commonwealth *Customs Tariff Act 1995* and related legislation. However, ACBPS also administers legislation on behalf of other government agencies. In terms of products inappropriately contaminated with chemicals the ACBPS has the power to hold, seize, test and in certain circumstances recall products. This will often be undertaken in consultation with NICNAS, OCS, TGA, AQIS, APVMA, ACCC and the Australian Federal Police depending on the type of chemical or product (personal communication, D Hunt, 15 September 2010).

Additional Standing Councils relevant to chemicals regulation and policy

There are a number of other Standing Councils, regulators and policy bodies that deal with a range of issues relating to chemicals including water, transport, land use planning and acute exposure to chemicals and the emergency management of chemical-related incidents pertaining to them (Tables 1a and 1b) (Figure 1).

Conclusion

This paper describes the system of chemical regulators and government policy bodies responsible for protecting public health in Australia. Understanding this system should be paramount to any policy maker or public health

worker in the area of chemical exposure as it is essential for effective environmental health responses and policy development, and will lead to greater efficacy in environmental health outcomes.

Acknowledgments

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Table 1a. Areas of chemical regulation stratified by level of government in Australia

Tier of government	Area	Industrial Chemicals	Agricultural and Veterinary Products	Therapeutic Goods	Food Products	Chemical Exposure Standards
Federal (Ministerial council)			SCoPI	SCoH	LGFFR	SCEW
Federal (Ministerial council support body)			PISC	AHMAC	FRSC	NEPC NEPCC
Federal (Minister responsible)	Health & Ageing		Agriculture, Fisheries & Forestry	Health & Ageing	Health & Ageing	
Federal (Secretariat)	DoHA		DAFF	DoHA	DoHA	NEPCSC
Federal (Main regulatory body and responsibility)	NICNAS (DoHA) Assess industrial chemicals and cosmetics		APYMA (Statutory Authority) Assess and register agricultural and veterinary chemicals and products. Adverse Experience Reporting Program and product recall function	TGA (DoHA) Assess and register medicines, ensuring quality, safety, efficacy and availability	FSANZ (Statutory Authority) Develop and maintain Food Standards Code. Assess chemicals in foods	NEPC (Statutory Council) Develop NEPMs. Assess and report on the effectiveness of NEPM implementation
State (regulatory responsibility)	Operationalise recommendations around industrial chemicals through poisons scheduling, environmental protection processes and in safety of consumer goods		Control use of pesticides and veterinary medicines beyond the point of retail sale through legislative initiatives, codes of practice manuals, or standard operating procedures	Determine place of purchase, packaging and labelling of drug or poison. State and territory governments classify the vast majority of drugs and poisons in accordance with the SUSMP	Investigate contaminated foods, enforce and interpret the Food Standards Code	Implement NEPMs
State Regulators						
NSW	NSW FT, NSW EPA, NSW Health		NSW EPA/DPI	NSW Health	NSW FA	NSW EPA
ACT	DJCS, ACT Health, ESD		ESD	ACT Health	ACT Health	ESD
NT	DJ CA, DH, NRETAS		DPIF	DH	DH	NRETAS
Qld	DJAG, Qld Health, DEHP		DAFF, Qld Health	Qld Health	Qld Health, SF Qld	DEHP
SA	CBS, SA Health, EPA SA		SA Health, PIR SA	SA Health	SA Health, PIR SA, DA SA	EPA SA
Tas	DoJ, DHHS, DPIPWE		DPIPWE	DHHS	DHHS, DPIPWE	DPIPWE
Vic	DoJ, DoH, EPA Victoria		DPI	DoH	DoH, PS Vic, DFS Vic	EPA Victoria
WA	DoC, DoH, DEC		DAF, DoH	DoH	DoH	DEC

See Table 2 for a list of acronyms used in this table.

Table 1b. Areas of chemical regulation stratified by level of government in Australia (continued)

Area	Defective Products	Acute Exposure	Transportation of Chemicals	Land Use Planning	Water
Tier of government					
Federal (Ministerial council)	CAF	SCPEM, IGC-ACC, SCoH	SCOTI		SCEW
Federal (Ministerial council support body)	CAANZ	National Policing Senior Officers Group, National Emergency Management Committee, Intergovernmental Committee on Drugs	Transport and Infrastructure Senior Officials' Committee		Senior Officers Committee
Federal (Minister responsible)	Assistant Treasurer	Attorney General, Home Affairs and Justice, Health & Ageing	Health & Ageing		Health & Ageing
Federal (Secretariat)	Treasury	Attorney Generals and DoHA	DTI		DSEWPC
Federal (Main regulatory body/ responsibility)	ACCC (Statutory Authority) Administer the <i>Competition & Consumer Act</i> . Ability to enforce or ban and develop standards	AFP, ACC, ACBPS Border protection and national coordination of crime prevention (illicit drugs and terrorism)	National Transport Commission Develop nationally consistent policies and regulation around transportation safety		NHMRC Foster the development of consistent health standards between the states and territories
State (regulatory responsibility)	Investigate, recall, interim ban and enforcement of defective or unsafe goods	Operational aspects of emergency management, drug enforcement and counter terrorism	Enforce legislation around the safe transportation of chemicals	Develop and enforce policies and regulations around land use in coordination with local government	Implement and enforce chemical requirements for drinking water
State Regulators					
NSW	NSW FT	MPES, NSW Police, NSW FB, NSW EPA, NSW Health, SES, RFS	NSW EPA & NSW WorkCover	NSW Planning and Infrastructure, NSW EPA	NSW Health
ACT	DJCS	ACT ESA, AFP, ACT Health	WorkSafe ACT	ESD	ACT Health
NT	DJ CA	NT PFES, DH, NT Worksafe	NT Worksafe	DLPE, NRETAS	DH
Qld	DJAG	DCS, Qld Police, Qld Health	DTMR	DSDIP, DEHP	DEHP
SA	CBS	SA MFS, SA CFS, SA Police, SA Health, EPA SA	SafeWork SA	DoPLG, EPA SA	SA Health
Tas	DoJ	DPEM, DHHS	WorkCover Tasmania	TPC, DPIPWE	DHHS
Vic	DoJ	OESC, Vic Police, DoH	WorkSafe Victoria	DPCD, EPA Victoria	DHS
WA	DoC	FESA WA, WA Police, DoH	DMP	Planning WA, DEC, DoH	DoH, ERA, DoW

See Table 2 for a list of acronyms used in this table.

Table 2. List of acronyms used in this paper

Federal Acronym	Name
ACCS	Advisory Committee on Chemicals Scheduling
ACMS	Advisory Committee on Medicines Scheduling
ACC	Australian Crime Commission
ACCC	Australian Competition and Consumer Commission
ACBPS	Australian Customs and Border Protection Service
AFP	Australian Federal Police
AHMAC	Australian Health Ministers' Advisory Council
AHPPC	Australian Health Protection Principal Committee
APVMA	Australian Pesticides and Veterinary Medicines Authority
AQIS	Australian Quarantine and Inspection Service
ARTG	Australian Register of Therapeutic Goods
CAANZ	Consumer Affairs Australia New Zealand
CAF	Legislative and Governance Forum on Consumer Affairs
DAFF	Department of Agriculture, Fisheries and Forestry
DoHA	Department of Health and Ageing
DSEWPC	Department of Sustainability, Environment, Water, Population and Communities
DTI	Department of Transport and Infrastructure
enHealth	Environmental Health Committee
FRSC	Food Regulation Standing Committee
FSANZ	Food Standards Australia New Zealand
IGC-ACC	Inter-Governmental Committee of the Australian Crime Commission
ISC	Implementation Sub-Committee
LGFFR	Legislative and Governance Forum on Food Regulation
NASPT	National Agvet System Policy Taskforce
NCCTG	National Coordinating Committee on Therapeutic Goods
NChEM WG	National Chemicals Environmental Management Working Group
NEPC	National Environment Protection Council
NEPCC	National Environment Protection Council Committee
NEPCSC	National Environment Protection Council Service Corporation
NEPMs	National Environment Protection Measures
NEPM WG	National Environment Protection Measures Working Group
NHEMS	National Health Emergency Management Subcommittee
NHMRC	National Health and Medical Research Council
NICNAS	National Industrial Chemicals Notification and Assessment Scheme
NTC	National Transport Commission
OCS	Office of Chemical Safety
PISC	Primary Industries Standing Committee
PS	Parliamentary Secretary for Health and Ageing
PSCC	Product Safety Consultative Committee
SCOC	Standing Committee on Chemicals
SCEW	Standing Council on Environment and Water
SCoH	Standing Council on Health
SCPEM	Standing Council on Police and Emergency Management
SCoPI	Standing Council on Primary Industries
SCOTI	Standing Council on Transport and Infrastructure
SPF	Scheduling Policy Framework
SUSMP	Standard for the Uniform Scheduling of Medicines and Poisons
TGA	Therapeutic Goods Administration
State Acronym	Name
New South Wales (NSW)	
DPI	Department of Primary Industries
MPES	Ministry for Police and Emergency Services
NSW EPA	NSW Environment Protection Authority
NSW FA	NSW Food Authority

(Continued)

Table 2. (Continued)

State Acronym	Name
NSW FB	NSW Fire Brigade
NSW FT	NSW Fair Trading
RFS	Rural Fire Service
SES	State Emergency Service
Australian Capital Territory (ACT)	
ACT ESA	ACT Emergency Services Agency
DJCS	Department of Justice and Community Safety – Office of Regulatory Services
ESD	Environment and Sustainable Development
Northern Territory (NT)	
DH	Department of Health
DJ CA	Department of Justice – Consumer Affairs
DLPE	Department of Lands, Planning and the Environment
DPIF	Department of Primary Industry and Fisheries
NRETAS	Department of Natural Resources, Environment, the Arts and Sport
NT PFES	Northern Territory Police, Fire and Emergency Services
Queensland (Qld)	
DAFF	Department of Agriculture, Fisheries and Forestry
DCS	Department of Community Safety
DEHP	Department of Environment and Heritage Protection
DJAG	Department of Justice and Attorney General – Office of Fair Trading
DSDIP	Department of State Development, Infrastructure and Planning
DTMR	Department of Transport and Main Roads
SF Qld	Safe Food Queensland
South Australia (SA)	
CBS	Consumer and Business Services
DA SA	Dairy Authority South Australia
DoPLG	Department of Planning and Local Government
EPA SA	Environmental Protection Authority South Australia
PIR SA	Department of Primary Industry and Regions South Australia
SA CFS	South Australian Country Fire Service
SA Health	South Australian Health
SA MFS	South Australian Metropolitan Fire Service
Tasmania (Tas)	
DHHS	Department of Health and Human Services
DoJ	Department of Justice – Consumer Affairs and Fair Trading
DPEM	Department of Police and Emergency Management
DPIPWE	Department of Primary Industries, Parks, Water and Environment
TPC	Tasmanian Planning Commission
Victoria (Vic)	
DFS Vic	Dairy Food Safety Victoria
DoH	Department of Health
DoJ	Department of Justice – Consumer Affairs Victoria
DPCD	Department of Planning and Community Development
DPI	Department of Primary Industries
DHS	Department of Human Services
EPA Victoria	Environment Protection Authority Victoria
OESC	Office of Emergency Services Commissioner
PS Vic	PrimeSafe Victoria
Western Australia (WA)	
DAF	Department of Agriculture and Food
DEC	Department of Environment and Conservation
DoC	Department of Commerce – Consumer Protection
DoH	Department of Health
DoW	Department of Water
DMP	Department of Mines and Petroleum
ERA	Economic Regulation Authority
FESA WA	Fire and Emergency Services Authority of Western Australia