GRAIN TRADE AUSTRALIA

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Mr. Martin Merrett
Director
Substances Section
Work Health and Safety Branch
Safe Work Australia
GPO Box 641
Canberra ACT 2601

Via email: Martin.Merrett@SafeWorkAustralia.gov.au

Dear Mr Merrett,

Re: Globally Harmonized System of Classification and Labelling of Chemicals

1. About Grain Trade Australia

Grain Trade Australia (GTA) is the focal point for the commercial grains industry within Australia. It facilitates trade and works to provide an efficient, equitable and open trading environment by providing leadership, advocacy and commercial services to the Australian grain value chain.

GTA members are responsible for over 95% of all grain storage and freight movements made each year in Australia. Over 95% of the grain contracts executed in Australia each year refer to GTA grain standards and/or trade rules.

GTA members are drawn from all sectors of the grain value chain from production to domestic end users and exporters. GTA members are involved in grain trading activities, grain storage, grain processing for human and stock feed milling.

GTA also attracts membership from organisations to the side of the value chain in related commercial activities such as financial (banking, stock exchanges etc), communications, grain advisory services, and professional services (e.g. solicitors and accountants).

Within this context, GTA provides comment on the abovementioned topic.

2. Nature of the Issue

GTA is a member of the International Grain Trade Coalition. At a recent meeting, GTA became aware of the "Report of the Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals on its twenty-seventh session held in Geneva from 2 to 4 July 2014" and the consideration of including grain dust explosion hazards in the Globally Harmonised System (GHS) as a new hazard class or as guidance.

We are aware that there are differing views within the sub-committee on the inclusion of grain dust explosion hazards by introducing a new hazard class or through specific guidance, to provide for a worldwide harmonized approach and that "the informal group on dust explosion hazards should continue to work on this issue on a step by step basis".

3. Australian Grain Industry View

It is the view of the Australian grain industry that grain dust explosion hazards should not be included in the GHS for classification and labelling of chemicals. There are a number of reasons for this view as outlined below:

- The Australian grain industry relies on self-regulation, involving a system and culture of continued improvement. Central to this strategy is industry adoption of common grain trading standards, outlining the quality of grain desired by the market and traded overseas. These standards list maximum levels for contaminants such as foreign material (including dust etc) and screenings material. These standards are set based on market requirements and have enabled Australian grain to maintain its reputation of being low in screenings and safe for human and animal consumption. As stated above, while these standards are not mandatory, over 95% of industry trade grain based on these common standards.

  As a demonstration of industry practices to export customers, and to ensure continual improvement, GTA members have recently adopted a Code of Practice for the management of grain within the Australian grain supply chain. Among other things, this Code outlines practices employed when storing and exporting grain, including maintaining grain hygiene through various means such as the use of grain dust extraction systems at bulk export terminals.

- It is recognised that grain movement creates dust. In order to maintain the reputation of Australian grain as being "clean", extensive hygiene measures such as facility design to minimise dust, cleandown of facilities, dust extraction etc are used throughout country storage facilities and at export terminals. In addition, during bulk vessel loading, outloading spouts are designed to minimise dust, although the risk of dust explosion at this point is generally regarded as relatively low compared to other areas of grain facilities.

- Regulations in Australia already cover the requirement for facilities to manage the potential explosive nature of dust. Recognising the various factors needed for dust to become "explosive" (particle size, dispersal/concentration, ignition source, oxygen etc) these regulations cover both the design of the facilities (and fittings etc) and the occupational health and safety issues associated with grain dust (exposure standards etc). While adherence to these regulations in grain handling operations throughout the supply chain is therefore mandatory, many facilities operate at a level that may be of a standard higher than the minimum required. To include additional regulations that are over and above national regulations, may lead to excessive costs and practices that provide no practical benefit. Given that similar regulations apply in other exporting countries, development of an agreed international position may be impractical.

Australian grain has a reputation of being low in screenings and relatively clean and free of dust. Extensive management systems are employed at all stages of the grain supply chain to manage the quality of the grain and ensure grain is supplied to customers that meets contractual requirements and is considered to be safe for human and animal consumption, These practices have operated successfully for many years, with minimal intervention from Government via legislation and regulations.

The potential inclusion of further grain dust regulations is not required and will potentially lead to overly burdensome regulations, leading to additional costs for no additional benefit. The Australian grain industry requests you support our views that grain is not included as a chemical hazard at future meetings of the sub-committee and at other relevant forums where the topic of grain dust occurs.

Should you require any clarification of this issue, please do not hesitate to contact me.

Yours sincerely

Geoff Honey
Chief Executive Officer