

17 May 2023

Medicines.Scheduling@health.gov.au

Dear Sir/Madam

Public consultation on proposed amendments to the Poisons Standard - ACMS & Joint ACMS-ACCS, JUNE 2023 – Lead in antifouling paints

I write to express our support for the proposal to increase the maximum lead concentration in antifouling paints from 90 ppm to 600 ppm.

The availability of suitable and effective antifouling paints is vital for Australia's maritime sector, including shipbuilding, fisheries, marine transport and commercial fleet. The loss of appropriate antifouling technologies in Australia would also result in the loss of critical repair and maintenance activities.

Antifouling paints play an essential role in protecting Australia's marine environment from invasive species that damage native species and waterways and threaten Australian fisheries and aquaculture.

As noted in the pre-meeting public notice, the proposed 600 ppm lead limit is consistent with the limits imposed in other major jurisdictions. Aligning Australia's lead limit with the limits applied in other jurisdictions will ensure that Australia continues to have access to suitable and effective antifouling paints.

Yours sincerely



Neil Patchett

General Manager Government and Public Relations

Boating Industry Association Ltd