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Australian Government
 Department of Health, Disability and Ageing
 Therapeutic Goods Administration

Office use only
 Listing Compliance Section,
 Complementary and OTC Medicines
 Branch (LCS COMB)

1.1 Decision Record – Release of information under s61 of the Act

This decision record is for the release of certain therapeutic goods information relating to sunscreens listed in the Australian Register of Therapeutic Goods (**Register**) in relation to Veganic SKN Pty Ltd (**Veganic**) (set out in Table 1 below) where, when released for supply, the label for those sunscreens:

- a. contain an AUST L number that corresponds to an entry in the Register in relation to Veganic or a person on whose behalf Veganic manufactures that therapeutic sunscreen; and
- b. contain any name for the sunscreen other than the name identified in the entry in the Register that corresponds to the AUST L number on the label; or
- c. contain any SPF indication that is not accepted in relation to the entry in the Register that corresponds to the AUST L on the label.

(White Label Goods)

Table 1 – Sunscreens listed in the Register in relation to Veganic

AUST L number	Register Name
519485	ZinCLEAR M01
519486	SParms Organic Sensitive Skin Facial Sunscreen
515725	ZinCLEAR A02
515727	ZinCLEAR S06
515726	ZinCLEAR S05
515733	ZinCLEAR SA02
515728	ZinCLEAR S07
515730	ZinCLEAR SM05
515729	ZinCLEAR SM04
511725	ZinCLEAR ST01
482394	ZinCLEAR SA01
482407	ZinCLEAR SM03

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468425	ZinCLEAR A01
445961	ZinCLEAR S04
444962	ZinCLEAR SM02
444957	ZinCLEAR S02
444961	ZinCLEAR S03
407959	zinclearS01
398844	SParms Organic Kids Sunscreen
402729	ZinClear Hydrating Sunscreen SPF50
398843	SParms Organic Sensitive Skin Facial Sunscreen

Decision to release information under s 61 of the Act

I am a delegate of the Secretary for the purposes of subsections 61(7)(b) of the *Therapeutic Goods Act 1989 (Act)*. Under this subsection, I have decided to release the information contained in Attachment A (TRIM: [D26-285391](#)) (the Information) to the public.

In my view the Information:

- a. is 'therapeutic goods information' as defined in s 61(1) of the Act. This is because it is information (namely, information about the law as it applies to sunscreen labelling for those goods) in relation to therapeutic goods (namely, the White Label Goods) that is held by the Department and relates to the Department's functions (including, for example, the maintenance of a national system of controls relating to the availability of therapeutic goods that are used in Australia (s 4(1)(a)(i) of the Act).
- b. is related to the reasons for the withdrawal of therapeutic goods from supply in Australia in circumstances where:
 - i. the TGA has received correspondence from at least one person who was purchasing White Label Goods from Veganic for on-supply, [s47G](#) [s22](#) [-s47G](#) [s47G](#)), advising that they 'currently hold stock that [they] cannot lawfully supply until [they] understand [their] regulatory obligations' (TRIM: [D26-285994](#)), which I understand to mean that they have presently withdrawn from supply the White Label Goods that they were previously supplying.
 - ii. the TGA has written to 18 of persons that it has identified as persons who have purchased, or are purchasing, White Label Goods from Veganic for on-supply (TRIM: [D25-5775984](#)) to advise them (1) that it is unlawful for them to advertise, or cause the advertising, of the White Label Goods, unless they are the subject of an exemption, approval or authority under the Act or regulations or the reference to those goods is authorised or required by a government or government authority, and (2) that it is also unlawful for them to supply the White Label Goods to a person other than the ultimate consumer of the goods. As such, I consider that it is likely that at least some of these persons will shortly withdraw the White Label Goods from supply.
 - iii. the TGA has written to Veganic (1) to advise that they must immediately cease manufacturing, advertising and supplying White Label Goods, and (2) to foreshadow that a delegate of the

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Secretary is considering whether to issue an enforceable direction, under s 42YT of the Act, requiring Veganic to (among other things) cease the supply of, and quarantine, White Label Goods that remain in the possession or control of Veganic. As such, I consider that Veganic may withdraw the White Label Goods from supply in due course.

s 42 LPP

I am not required to observe any requirements of the natural justice hearing rule in relation to the release of information under s 61(7) (s 61(13)(b)).

I consider it appropriate to exercise my discretion to release the Information for two reasons.

First, the Information relates to the withdrawal of up to at least 62 uniquely named and branded sunscreens from the market, and possibly more that the TGA has not identified.

In circumstances where approximately 23 listed sunscreens withdrawn from supply between September and November 2025 (on the basis of cancellation and/or recall for reasons relating to lack of SPF efficacy or formula splitting), I consider it likely that the public has an ongoing interest in the availability of sunscreens that they are using or may wish to use, as well as the reasons why some sunscreens may cease to become available.

In the absence of the Information, I consider that consumers could conceivably (and incorrectly) assume that White Label Goods withdrawn from supply have been withdrawn for reasons relating to efficacy or formulation splitting, and that consumers possessing White Label Goods may cease using them in those circumstances. This may, in turn, expose consumers who purchased White Label Goods prior to their withdrawal to an elevated risk of sunburn, skin damage and ultimately skin cancer.

I am therefore minded to exercise my discretion to release the Information to the public on the basis that doing so will ensure that the public have an understanding of the reasons for the White Label Goods being withdrawn from the market.

Second, the Information provides guidance about how the Act applies to sunscreen labelling.

In circumstances where the TGA cannot confidently identify all persons who are purchasing White Label Goods from Veganic for on-supply, and where the [ABC have published information](#) about the White Label Goods, the TGA anticipates that there may be at least 62 number of businesses who are unclear on their regulatory obligations, or are under a misapprehension regarding their regulatory obligations.

In the absence of the Information, I consider that some of those businesses (and other, as yet unidentified businesses) may cease operating entirely due to a lack of clarity as to the options available to regularise the situation, while others may continue operating their business in an unlawful way. Where businesses continue to operate in an unlawful way, I consider that this may impede the ability of consumers and businesses to properly identify the entry in the Register associated with a product if needed, frustrate post-market actions such as recalls, and impede the TGA's ability to identify instances where the name of a therapeutic good claims that it is suitable for an indication that is not accepted in relation to the good in the Register.

It is also possible that other businesses are engaging in similar white labelling practices, or alternatively may consider such practices (based on public comments by Veganic to the effect that its practices are lawful). This may give rise to similar issues as those identified above concerning Veganic and the businesses on-selling the White Label Goods.

I am therefore minded to exercise my discretion to release the Information to the public on the basis that doing so will ensure that businesses affected by these matters will obtain clarity regarding their legal obligations and conduct themselves in accordance with those obligations, thereby supporting the regulatory objectives underpinning the existence of those obligations.

The Information will be released to the public by way of publication on the TGA's website.

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Signed electronically,

Avinash Clarke
Assistant Secretary
Complementary and OTC Medicines Branch
22 January 2026

OFFICIAL

From: [CLARKE, Avinash](#)
To: s22
Cc: s22
Subject: s 42 LPP
 [SEC=OFFICIAL:Sensitive, ACCESS=Legal-Privilege]
Date: Tuesday, 20 January 2026 5:29:50 PM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.gif](#)
[image005.png](#)

OFFICIAL:Sensitive//Legal-Privilege

Thanks s22 Confirm I am comfortable with content and approach. I will esign delegate decision record once letters have been dispatched.

s22 I do want you to consider de-identifying all letters (include the one to Veganics – also involving names in screenshots being redacted). I understand this is allowable under our policy. Given the nature of the many statements made by the sponsor in question on public forums, de-identifying decision makers/signatories seems a prudent step.

Avi

Avinash Clarke
 Assistant Secretary
 Complementary and Over the Counter Medicines Branch
 Therapeutic Goods Administration
 Department of Health, Disability and Ageing
 T: 02 5132 1436 | E: avinash.clarke@health.gov.au

The Department of Health and Aged Care acknowledges First Nations peoples as the Traditional Owners of Country throughout Australia, and their continuing connection to land, sea and community. We pay our respects to them and their cultures, and to all Elders both past and present.

OFFICIAL:Sensitive//Legal-Privilege

From: s22 @Health.gov.au>
Sent: Tuesday, 20 January 2026 4:32 PM
To: s22 @Health.gov.au>; CLARKE, Avinash
 <Avinash.CLARKE@Health.gov.au>
Cc: s22 @health.gov.au>; s22
 s22 @Health.gov.au>
Subject: s 42 LPP
 [SEC=OFFICIAL:Sensitive, ACCESS=Legal-Privilege]

OFFICIAL:Sensitive//Legal-Privilege

Thanks s22 [redacted]

s 42 LPP [redacted]

- [redacted]
- [redacted]
- [redacted]
- [redacted]

Avi, would appreciate your confirmation of the content and approach before we proceed with dispatching.

s 42 LPP [redacted]
[redacted]

s22 [redacted]

OFFICIAL:Sensitive//Legal-Privilege

s 42 LPP



TGA statement on sunscreen labelling practices

Published

XX January 2026

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The TGA is aware of [reporting by the ABC in late 2025](#) about companies allegedly using the same Australian Register of Therapeutic Goods (**ARTG**) listing number (called an [AUST number](#)) for multiple sunscreen products that have different names and/or different intended uses (called indications) from those recorded in the ARTG.

The purpose of this statement is to provide guidance to industry about how the *Therapeutic Goods Act 1989* (**Act**) applies in relation to sunscreen labelling.

The TGA expects that, because of this issue, some sunscreens may be withdrawn from supply in Australia. The TGA also acknowledges that some consumers may currently be using an affected sunscreen. This statement is therefore also intended to give information to the public about the reasons those sunscreens are being withdrawn from supply and what consumers should do if they are using one of the affected sunscreens.

Information for industry

Summary

The name and indications on the label of a sunscreen must match the name and indications listed in the ARTG for the AUST number on the label.

If the name and indications on the sunscreen are different from the ARTG, then the sunscreen is not listed in the ARTG, even if it has an AUST number on the label.

If you are manufacturing, advertising or supplying a sunscreen that is not listed in the ARTG, you may be committing a criminal offence and you may be liable for civil penalties.

The therapeutic goods framework

Sunscreens that are represented as being primarily to protect the skin from ultraviolet (UV) radiation must be in the ARTG unless they are exempt. Sunscreens can be included in the ARTG in two ways:

1. Sunscreens that are for application to the skin and meet the criteria in item 7 of Schedule 4 to the *Therapeutic Goods Regulations 1990* (**Regulations**) are '[listable goods](#)'. This means that they can be 'listed' in the ARTG.
2. Sunscreens that are not for application to the skin or do not meet the criteria in item 7 of Schedule 4 to the Regulations must be '[registered](#)' in the ARTG. This is a much higher regulatory threshold and is usually used for higher risk therapeutic goods.

The therapeutic goods framework is designed to make sure that things that are in the ARTG are the same as the goods that are being manufactured, advertised and supplied in the Australian market.

For 'listable goods' other than export only medicines, this means that the goods being manufactured, advertised and supplied must have the same name and indications as the goods listed in the ARTG.¹ If the goods being manufactured, advertised and supplied do not have the same name and indications as the goods listed in the ARTG, they are 'separate and distinct' from the goods listed in the ARTG. This has the legal effect that the goods, as manufactured, advertised and/or supplied, are not in the ARTG at all.

A person is the sponsor of a sunscreen if they export, import or manufacture the sunscreen, or arrange for that to be done, unless they do so on behalf of another person who resides, or carries on a business, in Australia.

If you are the sponsor of a sunscreen affected by the issues described above, it is unlawful for you to manufacture (including by labelling), supply or advertise the sunscreen unless an exemption, approval or authority applies.

If you are not the sponsor, it is unlawful for you to advertise the sunscreen and it is unlawful for you to supply the sunscreen to anyone other than the ultimate consumer.

The TGA's concerns

The TGA has identified cases where sunscreens have been labelled with an AUST number but the name or indications on the label of the goods do not match the information in the ARTG for that AUST number.

¹ See s 16(1A)(d) of the Act when read with r 11(1)(a) and (b) of the Regulations.

The laws dealing with these issues are important. They ensure that consumers and businesses can properly identify the entry in the ARTG associated with a sunscreen if needed, and they help to facilitate adverse event reporting and post-market actions such as recalls. They also help the TGA ensure that businesses have evidence that their sunscreens work.

What to do if I identify this problem with my product?

If you think that you are unlawfully dealing with a sunscreen that is not listed in the ARTG for the reasons set out above, you should immediately stop what you are doing.

If you want to continue dealing with that sunscreen, you must make sure that the sunscreen is entered in the ARTG with the correct details. This means that the sponsor of the sunscreen must:

1. Apply for a new ARTG listing for the sunscreen with its actual name and indications.
2. Make the required certifications under section 26A of the Act, including that you hold evidence to support each indication for the sunscreen.
3. Ensure all labelling and presentation is accurate and complies with Therapeutic Goods Orders and applicable regulatory requirements.
4. Ensure that any labelling activities are conducted by a TGA-licensed or TGA-certified GMP facility, as labelling of finished goods is considered a manufacturing step.

If you are unsure whether you are unlawfully manufacturing, advertising or supplying sunscreen for the reasons set out above, you should consider seeking independent advice from a [regulatory affairs consultant](#) or lawyer.

What will the TGA do?

The TGA will continue reviewing the manufacture, advertising and supply of white-labelled sunscreens and sunscreens with customised labels to assess whether compliance or enforcement action is warranted.

Where the TGA has identified potentially unlawful manufacture, advertising or supply and we have identified contact details for the person responsible for that conduct, we have written to the person to advise them of their regulatory obligations.

The TGA has also issued this statement to help ensure that any affected suppliers that we have not yet been able to identify or notify are aware of their obligations under the Act.

The TGA may take regulatory action where non-compliant labelling or white-labelling practices result in the unlawful manufacture, advertising or supply of sunscreens that legally are not entered in the ARTG. Options may include:

- Enforceable directions (e.g., to quarantine, relabel or destroy goods)
- Infringement notices
- Civil penalty proceedings
- Referral to the Commonwealth Department of Public Prosecutions for criminal prosecution, where appropriate

Information for consumers

All sunscreens we regulate must be included in the ARTG and display an AUST number on the front product label. This AUST number is linked to one specific product, including its name and what it is to be used for. The label on the sunscreen must match the information linked to that AUST number. You can read more about [how we regulate sunscreens](#).

The TGA's concerns

The TGA has identified sunscreens where:

- the AUST number on the label is in the ARTG, but
- the product name or intended use on the label does not match what is recorded in the ARTG for that AUST number.

Correct labelling is important so that:

- consumers can easily identify the sunscreen they are using and check that it is a product listed on the ARTG if needed, and
- the TGA can take action if there is a problem or concern with a sunscreen.

What will the TGA do?

The TGA has contacted some suppliers and retailers where sunscreens have been identified as having this issue, to make them aware of their regulatory obligations.

The TGA has also published this statement so that any other suppliers and retailers affected by this issue, including those the TGA has not yet been able to contact directly, are aware of their regulatory obligations.

As a result, consumers may notice that some sunscreens have been, or are being removed from sale as suppliers and retailers take action to meet their regulatory obligations.

The TGA will continue reviewing sunscreens affected by this issue to decide whether any compliance or enforcement action is necessary.

What should I do if I am using one of these sunscreens?

If you can't find your sunscreen on the [ARTG](#) when searching by name, you should try searching using the AUST number on the label.

If you are [Checking to see if your sunscreen has been recalled](#), you should also search by AUST number.

If you want to [Report a problem with your sunscreen](#), please tell us the AUST number as well as the name on the label. Your report helps us identify sunscreens that may need investigation.

You can visit the TGA's webpage on [How to choose a sunscreen](#) to understand what to look for when choosing a sunscreen, including Sun Protection Factor (SPF), broad spectrum and an AUST number.

Topics

[Complementary medicines](#) [Over the counter \(OTC\) medicines](#) [Sunscreens](#)

From: s22
 To: s22
 Subject: Fw: Clarification Required Regarding Sponsor Identification / ARTG Number for Sunscreen Product CCEMS:04270008627 [SEC=OFFICIAL]
 Date: Friday, 16 January 2026 5:02:32 PM
 Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[-WRD1488.jpg](#)
[image001.png](#)

FYI

Get [Outlook for iOS](#)

From: Enquiries - Listing Compliance <enquiries.listingcompliance@tga.gov.au>
 Sent: Friday, January 16, 2026 4:51:56 PM
 To: s22 @Health.gov.au
 Cc: s22 @Health.gov.au
 Subject: FW: Re: Clarification Required Regarding Sponsor Identification / ARTG Number for Sunscreen Product CCEMS:04270008627 [SEC=OFFICIAL]

OFFICIAL

Hi s22

We've received a follow-up email from the sponsor regarding an enquiry you were previously handling. I'm just forwarding this to you for visibility and further action.

Thanks

Kind Regards,

s22
 Compliance Evaluator – Listing Compliance Section

OFFICIAL

From: Non-prescription Medicines <nonprescriptionmedicines@health.gov.au>
 Sent: Friday, 16 January 2026 3:46 PM
 To: Enquiries - Listing Compliance <enquiries.listingcompliance@tga.gov.au>
 Subject: FW: Re: Clarification Required Regarding Sponsor Identification / ARTG Number for Sunscreen Product CCEMS:04270008627 [SEC=OFFICIAL]

OFFICIAL

Dear LCS

Please see below for your review. Can I confirm a response is still being drafted? (See [D25-5771629](#))

Thanks,

s22

OFFICIAL

From: s22 <info@s47G>
 Sent: Thursday, 15 January 2026 5:47 PM
 To: Non-prescription Medicines <nonprescriptionmedicines@health.gov.au>
 Subject: Re: Re: Clarification Required Regarding Sponsor Identification / ARTG Number for Sunscreen Product CCEMS:04270008627 [SEC=OFFICIAL]

OFFICIAL

Dear TGA team,

I am writing to follow up on my enquiry that was escalated to the Listing Compliance Section regarding the sponsor and ARTG requirements for my sunscreen product. It has now been almost a month, and I have not yet received an outcome.

To ensure there is no ambiguity about my situation:

- The product is manufactured by a third party (VeganicSKN).
- It is supplied in Australia under **my own brand name s47G**
- I am the importer and the business selling the product to consumers.
- The manufacturer has advised that I should use *their* existing AUST L number.

Could you please confirm, for this specific scenario, whether I am required to be the **Sponsor** and hold **my own ARTG entry (AUST L/A)** for the product sold under my brand?

This clarification is critical, as I currently hold stock that I cannot lawfully supply until I understand my regulatory obligations.

Thank you very much for your assistance.

Kind regards,
 s22
 s47G

OFFICIAL

On Fri, Dec 19, 2025 at 1:14 PM Non-prescription Medicines <nonprescriptionmedicines@health.gov.au> wrote:

|

OFFICIAL

Dear s22

Thank you for your email of 16 December 2025 to the Therapeutic Goods Administration (TGA), which has reached the Non Prescription Medicines and OTC Medicines Branch.

Please be advised that the Listing Compliance Section is seeking advice from the Legals team to best answer your enquiry. We seek to provide you with a response as soon as possible.

We appreciate your patience on this matter

Regards, s22

Stakeholder Engagement Team
Non-Prescription Medicines

Business Improvement & Support Section | Complementary & Over the Counter Medicines Branch
Australian Government, Department of Health, Disability and Ageing
Therapeutic Goods Administration

Phone: 02 6289 4627

Email: nonprescriptionmedicines@health.gov.au

PO Box 100, Woden ACT 2606

www.tga.gov.au



This information is given to you without prejudice and is not binding on the TGA. It is the responsibility of the sponsor to ensure that all of the legislative requirements are met.

The Department of Health, Disability, and Ageing acknowledges First Nations peoples as the Traditional Owners of Country throughout Australia, and their continuing connection to land, sea and community. We pay our respects to them and their cultures, and to all Elders both past and present.

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OFFICIAL

OFFICIAL

From: s22 <info@s47G>

Sent: Tuesday, 16 December 2025 10:38 AM

To: Non-prescription Medicines <nonprescriptionmedicines@health.gov.au>

Subject: Re: Clarification Required Regarding Sponsor Identification / ARTG Number for Sunscreen Product CCEMS:04270008627 [SEC=OFFICIAL]

OFFICIAL

Good morning,

I am following up on my inquiry about TGA compliance of my sunscreen. Can you please get back to me as soon as possible?

Kind regards,

s22
s47G



OFFICIAL

OFFICIAL

On Thu, 11 Dec 2025 at 13:23, Non-prescription Medicines <nonprescriptionmedicines@health.gov.au> wrote:

Dear s22

Thank you for your emails of 9th and 10th December 2025 to the Therapeutic Goods Administration (TGA), which have reached the Complementary and OTC Medicines Branch.

Your enquiry has been escalated to a subject matter expert within the Listing Compliance Section. We seek to provide you with a response as soon as possible.

We appreciate your patience on this matter.

Kind regards,

s22

Stakeholder Engagement Team
Non-Prescription Medicines

Business Improvement & Support Section | Complementary & Over the Counter Medicines Branch
Australian Government, Department of Health, Disability and Ageing
Therapeutic Goods Administration

Phone: 02 6289 4627
Email: nonprescriptionmedicines@health.gov.au

PO Box 100, Woden ACT 2606
www.tga.gov.au



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----- Original Message -----

Thank you for your prompt response.

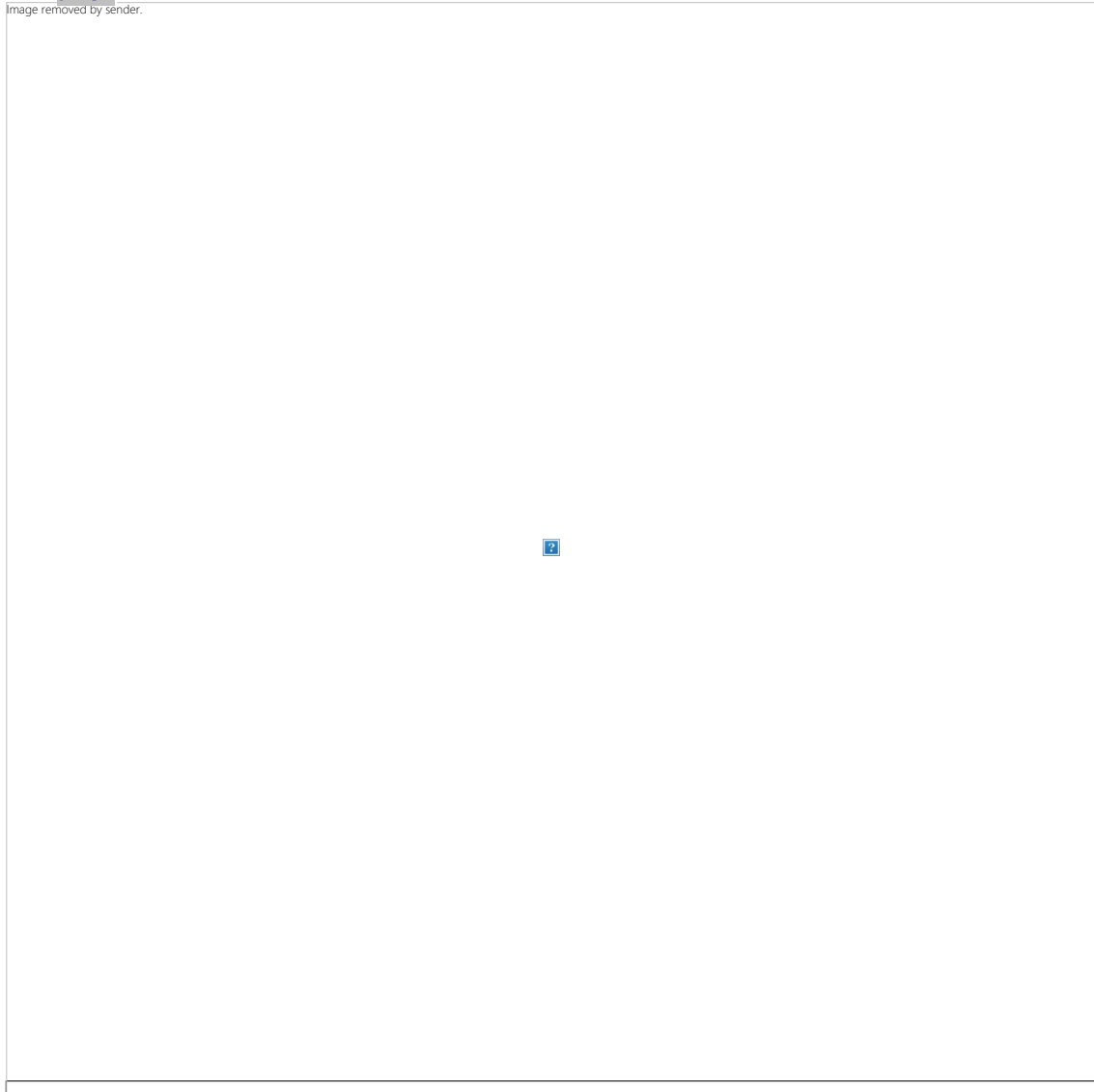
I am finding this difficult to understand. Can you please be specific in plain English.

I have purchased sunscreen from VeganicSKN and am selling under the brand name **s47G**. Do I need to be a sponsor myself and get my own ARTG entry or can I use theirs?

Kind regards,

s22
s47G

Image removed by sender.



OFFICIAL

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OFFICIAL

OFFICIAL

On Wed, 10 Dec 2025 at 15:24, TGA Info <info@tga.gov.au> wrote:

Dear s22

Thank you for your further enquiry.

A sponsor can authorise a distributor to supply their products on their behalf, usually through a contractual arrangement between the sponsor and distributor.

A distributor acts on behalf of the sponsor and can only supply the product in accordance with the conditions of inclusion.

The sponsor remains responsible for supply of the product and all post-market monitoring and reporting responsibilities.

There is no requirement for distributors or third party suppliers to become a sponsor if they are sourcing the product from the sponsor or from the manufacturer under the sponsors direction or control and supplying them.

I hope this information is of assistance.

Yours sincerely

s22

TGA Contact Centre

Regulatory Assistance Section

Regulatory Engagement Branch

Phone: 1800 020 653 | Fax: 02 6203 1605

Email: info@tga.gov.au

Therapeutic Goods Administration

Department of Health, Disability and Ageing

PO Box 100

Woden ACT 2606

www.tga.gov.au



This response is general information given to you without prejudice; it is not binding on the TGA and you should get your own independent legal advice to ensure that all of the legislative requirements are met.

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----- Original Message -----

From: s22 <info@s47G>

Received: Wed Dec 10 2025 13:00:10 GMT+1100 (Australian Eastern Daylight Time)

To: TGA Info <info@tga.gov.au>; info@tga.gov.au <info@tga.gov.au>; info-Queue <info@tga.gov.au>;

Subject: Re: Clarification Required Regarding Sponsor Identification / ARTG Number for Sunscreen Product [SEC=OFFICIAL] CCEMS:04270008627

OFFICIAL

Hi s22

Thank you for getting back to me so quickly.

I find the information a little bit confusing. Just to clarify where we stand, can you please provide an answer to the following question.

We purchased the product from the Australian manufacturer VaganicSKN. It was packaged with their AUST L number. On that packaging is our business name and logo. Do we need our own AUST L number to sell our product in Australia?

Thank you,

Kind regards,

s22 s47G

Image removed by sender.



OFFICIAL

On Tue, 9 Dec 2025 at 11:17, TGA Info <info@tga.gov.au> wrote:

Dear **S22**

Thank you for your enquiry of 8/12/2025 to the [Therapeutic Goods Administration](#) (TGA).

Therapeutic goods must be entered in the [Australian Register of Therapeutic Goods](#) (ARTG) before they can be lawfully supplied in or exported from Australia, unless exempt from being entered in the ARTG, or otherwise authorised by the TGA.

There are a number of factors to consider when importing goods to Australia for commercial supply and we have provided some information below to assist you. Please note that if therapeutic goods are imported from overseas for commercial sale, the importer of the goods is the 'sponsor' for the purpose of the *Therapeutic Goods Act 1989* (the Act).

A [sponsor](#) (i.e. the individual or company intending to supply the goods) is responsible for meeting the regulatory requirements of the therapeutic goods legislation. A sponsor does one or more of the following:

- exports therapeutic goods from Australia
- imports therapeutic goods into Australia
- manufactures therapeutic goods for supply in Australia or elsewhere
- arranges for another party to import, export or manufacture therapeutic goods.

Each ARTG entry is specific to a product and a sponsor.

If your product is already included in the ARTG, we have already authorised it for supply for another sponsor. You can apply to become a sponsor yourself and have your product entered in the ARTG under a **different product name** or contact the sponsor of the ARTG entry to find out if you can become a **wholesaler** or **retailer**.

If your product is not in the ARTG, you will need to apply to become a sponsor and have your product entered in the ARTG.

A short video providing a [summary of supplying therapeutic goods in Australia](#) is available on the TGA website, which outlines the process and responsibilities you need to consider when deciding to become the sponsor of a therapeutic good.

You may also wish to refer to the [SME Assist hub](#). SME Assist is a dedicated service that TGA offers to help small to medium enterprises (SMEs), researchers, start-ups and those unfamiliar with regulation to understand their regulatory and legislative obligations.

Yours sincerely

s22

TGA Contact Centre

Regulatory Assistance Section
Regulatory Engagement Branch
Phone: 1800 020 653 | Fax: 02 6203 1605
Email: info@tga.gov.au

Therapeutic Goods Administration
Department of Health, Disability and Ageing
PO Box 100
Woden ACT 2606

www.tga.gov.au



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----- Original Message -----

From: s22 <info@s47G>;
Received: Mon Dec 08 2025 20:53:37 GMT+1100 (Australian Eastern Daylight Time)
To: TGA Info <info@tga.gov.au>; info@tga.gov.au <info@tga.gov.au>; Info-Queue <info@tga.gov.au>;
Subject: Clarification Required Regarding Sponsor Identification / ARTG Number for Sunscreen Product

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Good evening TGA Team,

I am seeking clarification and assistance regarding the correct Sponsor identification requirements for our sunscreen product, s47G

We were previously advised by our supplier/manufacturer, VeganicSKN that we were permitted to use their authentic TGA/ARTG number for our product. We have now been informed that we may need our own Sponsor details and/or ARTG entry instead. As a result, I want to ensure that we are meeting all compliance obligations correctly.

Could you please advise:

1. Whether a brand owner is permitted to rely on a supplier's ARTG number for a sunscreen product, or
2. If a separate Sponsor listing or number is required for our business, and
3. What steps we should take to resolve this correctly and remain compliant moving forward.

I would greatly appreciate your guidance on how to rectify this situation as soon as possible.

Thank you in advance for your assistance.

Kind regards,

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s47G

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