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Australian Aluminium Council Submission on the Draft Discussion Paper - Review of the Regulation of Products at the Interface between Cosmetics and Therapeutic Goods



May 2005

The Australian Aluminium Council (AAC) welcomes the opportunity to provide comment on issues raised in the Draft Discussion Paper - Review of the Regulation of Products at the Interface Between Cosmetics and Therapeutic Goods (March 2005).

Aluminium industry in Australia

The Australian Aluminium Council is the peak industry association representing the Australian aluminium industry. The Council's members are the companies operating in each of the following sectors:

- Bauxite mining
- Alumina refining
- Aluminium metal production
- Semi-fabricated aluminium production and distribution

The Council aims to:

- Increase understanding of the aluminium industry in Australia and internationally
- Encourage the growth of the aluminium industry in Australia and in the use of aluminium in Australia and overseas
- Act as a focal point for the industry on key national issues such as climate change, trade, health and the environment
- Inform and assist all those with an interest or involvement with the industry

AAC Health Panel meets regularly to discuss health and hygiene issues, and includes doctors and hygienists from our member companies covering all aspects of the industry (bauxite mining, alumina refining and aluminium smelting). The AAC Health Panel works in conjunction with the International Aluminium Institute's Health Panel on health and hygiene issues – ensuring comprehensive coverage of the issues pertinent to our industry.

Please see below for our comments on the draft review document.

4.1 Antiperspirants

The draft review states that; *"There have also been rumours of a link between the use of antiperspirants and breast cancer that have been the subject in the daily press."*⁶ (pg 48)

The Aluminium Council and its members are concerned with this statement and would like to have it qualified to the effect that there is no evidence to support a link between the use of antiperspirants and breast cancer¹. The weight of evidence just does not exist to support this piece of misinformation originally put forward Darbre² et.al.

The study carried out by Darbre was not conclusive and neither was it considered in any way a clinical result by either the industry or regulatory authorities. Even the study's author concluded that further research was necessary to prove or disprove the hypothesis made. The Australian Regulator NICNAS and the American Cancer Society also acknowledged that the report did not establish a causal link^{3,4}.

Also, the review notes that: *"In August 2003, the Medicines Evaluation Committee considered a new FDA mandatory warning statement to go on the labels of antiperspirants "Ask a doctor before use if you have kidney disease" (due to the presence of aluminium). The Committee decided that this was not necessary since people with significant renal impairment would be under treatment from a specialist who would advise them of the necessary precautions."* (pg 48)

The Aluminium Council would advocate for the last sentence to be supported by a statement that acknowledges that the dermal intake of aluminium is so low as to be almost negligible as a source of entry into the human body and, as such, is not a problem for healthy people and the majority of those unfortunate enough to be in ill health.⁵

References

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Concentrations of Parabens in Human Breast Tumours. Journal of Applied Toxicology. Vol 24, 2004, p. 5-13
3. NICNAS Response to Paraben Study:
http://www.ctfa.org.nz/information/antiperspirant/NICNAS_Parabens_Statement.pdf
4. American Cancer Society Response:
http://www.ctfa.org.nz/information/antiperspirant/American_Cancer_Society_on_Antiperspirants.pdf
5. Priest N.D. The Biological behaviour and Bioavailability of Aluminium in Man, with special reference to studies employing aluminium-26 as a tracer – review and study update, 2004