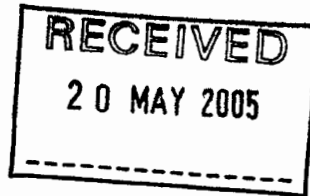


PHILL KEEFE  
PRESIDENT AND MANAGING DIRECTOR



AVON

the company for women

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May 17, 2005

Mr Pio Cesarin  
Director  
Chemicals and Non Prescription Medicines  
Therapeutic Goods Administration  
PO Box 100  
Woden ACT 2606

Dr Margaret Hartley  
Director  
Office of Chemical Safety, TGA  
NICNAS  
PO Box 58  
Sydney NSW 2001

Dear Mr Cesarin and Dr Hartley

**Response to the Recommendations of the Regulation of Products  
at the Interface between Cosmetics and Therapeutic Goods  
(NEWGREEN REVIEW)**

I write in support of the CTFA's response to the recommendations of the above Review as a result of consultation they have had with members of the cosmetic industry.

Our company supports moisturisers containing sunscreens being declared cosmetics, as it will allow us to market our full European range to the Australian market.

Over the last five years we have not introduced approximately 30 moisturising products containing SPF because of the unique requirements of the Australian Listing System.

We support the recommended changes for they will allow our globally marketed, innovative new products to be offered to Australian consumers without delay.

Avon only produces products that are safe, effective and fully tested to stringent European requirements. The burden of extra regulatory layers in Australia has frustrated our marketing plans, incurred extra costs and separate inventory items without improving the performance and safety of the product.

We applaud the direction of the Review and agree with the comments made by our industry association, the Cosmetic, Toiletry and Fragrance Association of Australia, Inc.

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Although we only market some of the products examined in this Review, but we believe it is a step in the right direction, for we believe that all cosmetics should be regulated by the claims they make and ingredients they contain.

We hope that the recommendations lead to greater harmonisation of Australian regulations with those of Europe and USA.

There are many moisturisers that we have not imported into Australia, because the regulatory requirements have just made it not worthwhile to do so. We trust this Review will lead to a better system of regulation, so that we can offer a full range of products to Australian consumers.

Mr Newgreen in his Report failed to recognise the quality standards all manufacturers use in the production of cosmetics today. Our reputation is at stake, with any product we sell; therefore Avon goes to extraordinary lengths to ensure products are safe and effective.

Best regards,



Phill Keefe