

Mrs Joanna Gash  
Member for Gilmore

Dear Joanna

As you are aware Nowra Chemicals has been lobbying the Howard Government through both your office and industry associations in regards to the TGA's stand on Antibacterial Skin Washes and other issues. The draft report from the TGA is now available, and again with no good reason the TGA has opted for the status quo, rather than change.

This is particularly disappointing following the changes that were implemented with the NICNAS Chemicals of low concern. This was a good example of compromise with industry and government considering the needs from all sides.

Nowra Chemicals would again like to lobby for a stratified approach to the regulation of hand washes as put forward by industry. Most importantly it would like the comments re-evaluated based on the following points.

The listing of Antibacterial Hand Soaps (as sunscreens are presently), will still provide the consumer with the same level of confidence, in regards to product safety, but without the high compliance costs. This should be the TGA's primary goal.

1. Antibacterial hand washes are not used to treat or cure ailments or set medical conditions.
2. Listing will reduce the need to test minor ingredients. Currently under Registration, all ingredients, however minor must be tested to BP standards.
3. Listing will still require GMP and efficacy data as do sunscreens.
4. Australian business is currently unable to compete, both locally and internationally due to these legislative issues. The additional registration fees, sampling and testing, and longer shelf life testing increases the costs to a prohibitive cost analysis.
5. Listable categories allow us to change colours, perfumes and minor no active ingredients within 3 months. Registered products take over 12 months. This time to market issue stops much innovation in the market, along with the new compliance testing which currently run at over \$15,000 more on a registered product vs. a listed product.

Nowra Chemicals acknowledges that in surgical scrubs a high degree of compliance testing should be implemented, and agrees with the industry position on this matter for a tiered approach. This will ensure risk vs. efficacy is always addressed.

It is clear in the area of skin disinfectants; the TGA has not taken into account the risk to the community vs. the cost benefits to industry as in line with COAG principles.

Again, Nowra Chemicals as a local employer within your electorate is inhibited in growing regional employment opportunities due to current government practices. Your assistance in this review would be greatly appreciated.

Yours sincerely

John Lamont  
CEO