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To: <cosmetic_review@nicnas.gov.au>
cc: <teri.snowdon@racgp.org.au>
Subject: Review of the regulation of products at the interface between
cosmetics and therapeutic goods

Dear Sir / Madam,

Thankyou for giving the public, interested parties and the medical profession an opportunity to comment on an important area of regulation of goods used on humans - whether this is in a therapeutic or cosmetic capacity.

The following views expressed are my own personal views as a General Practitioner and doctor and do not represent a formal position on this matter from the Royal Australian College of General Practitioners (RACGP), although they would hopefully express a similar opinion.

Overall, I felt that the review was comprehensive, covered the issues in adequate depth and addressed how such matters are regulated in Australia as well as overseas.

With respect to the recommendations proposed, I feel that a conservative stance has been taken and recommendations made so that many products will be regulated as therapeutic products (or goods) rather than cosmetics. From a medical perspective, I feel that this is not only prudent, but also will provide the best framework for ensuring the public's safety as well as continuing to encourage the high standard of therapeutic goods that we have become used to in Australia.

Where the exact purpose and impact of a product is not clearly defined (as in the case of antibacterial skin washes), the monitoring and review process will be vital.

I therefore agree that all the recommendations should be accepted as made.

Christos Pavlidis
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Royal Australian College of General Practitioners (RACGP) representative on
the Therapeutic Goods Advertising Code Council (TGACC)

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