



Pax Australia Pty Ltd
A.C.N. 000 447 414
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19 May 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

**Re: Response to the Recommendations of the
Regulation of Products at the Interface between Cosmetics and
Therapeutic Goods (NEUGREEN 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.

Pax Australia Pty Ltd is a contract manufacturer supporting the local manufacturing of major branded products in Australia. We hold TGA License No 60660 to manufacture such products.

Our company supports moisturisers containing sunscreens being declared cosmetics as it will allow us to manufacture in Australia additional European products to the Australian market.

Over the last five years we have missed out on business opportunities because of the unique requirements of the Australian Listing System.

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

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Pax Australia Pty Ltd only produces products that are safe, effective and fully tested to stringent requirements. The documentation to verify this is required by Pax upfront conditionally before we consider manufacturing. The burden of extra regulatory layers in Australia has frustrated our plans to grow the business with more local manufacturing content as branded companies chose not to market such products in Australia. We also believe that there is a reduction in product choice and long term competition as only very large organisations have the capability to comply.

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.

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

I hope this Review leads to a regulatory system that has been discriminatory in the type of product that is beneficial to the consumer

There are many moisturisers that could have been launched into Australia, but 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.

Yours Faithfully
Pax Australia Pty Ltd

A handwritten signature in black ink, appearing to read "Paul Curryer". The signature is written in a cursive, flowing style.

Paul Curryer
DIRECTOR & CHIEF EXECUTIVE OFFICER