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To: <cosmetic_review@nicnas.gov.au>
cc:
Subject: Review of the Regulation of Products at the Interface between
Cosmetics & Therapeutic Goods

20/05/2005 05:41 PM

EMAIL FROM MAURICE SHEEHAN, DIRECTOR

Re: Review of the regulation of products at the interface between cosmetics & therapeutic goods.

The Pharmacy Guild notes with concern Recommendation 4 of the Review, especially section C, that seems to indicate a lowering of regulation for some sunscreen agents.

TGA's publication "Australian regulatory guidelines for OTC medicines" at page 10.1 states "Australia has the highest rate of melanoma in the world" and that "many Australians use sunscreen every day of their lives".

Australian's love of the sun and surf has led to this situation with governments, schools and Cancer Councils pushing the "Slip, Slap, Slop" message. The Guild considers that it is essential the public have faith in the quality and reliability of products being marketed as sunscreens to ensure this important health message is understood and implemented.

The Guild considers removal of TGA oversight of these products, by not testing the products, diminishing the need to comply with GMP Codes and generally reducing the regulation of these products, will reduce the quality of these essential products, negatively impacting on the public and health professional's perception of the products and thereby reducing their use. If this happens, the detrimental health effects of this move will not be known for a number of years and it will cause significant suffering and health care costs.

The Guild considers this to be too great a risk to take and urges reconsideration of this recommendation.

END OF EMAIL

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