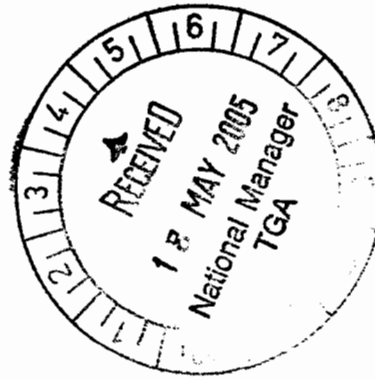


**Dr. W. REGAN AM**  
M.B., B.S., D.D.M., (Syd.) F.A.C.D.  
Consultant Dermatologist

LIVERPOOL: (02) 9602 8762  
CAMPBELLTOWN: (02) 4627 2527

71 BATHURST STREET  
LIVERPOOL 2170

1/4 BROWNE STREET  
CAMPBELLTOWN 2560



11 May, 2005.

*W. Regan*

*Mr Terry Slater*  
National Manager  
TGA  
PO Box 100  
Woden, ACT. 2606.

Dear Mr Slater,

AUSTRALIAN REVIEW OF POLICY FRAMEWORK FOR REGULATING PRODUCTS AT THE COSMETIC/THERAPEUTIC INTERFACE SPECIFICALLY SUNSCREEN PRODUCTS.

*I strongly oppose the deregulation of secondary sunscreens with an SPF of no more than 20.*

*Sun protection is vital and products with an SPF on the label are seen as providing an important therapeutic benefit. Similarly the designation broadspectrum.*

*The mention of the SPF on the label is itself a claim of efficacy of the product, for prevention of sunburn and skin cancer.*

*The SPF is a measured component dependent on quality manufacturing methods, stability of the formulation and use before a proven expiry date. There must continue to be controls by the TGA over all these aspects.*

*The TGA should require all sunscreen products to be listed on the Australian Register of Therapeutic Goods to ensure compliance with appropriate test method, quality standards, stability tests, Good Manufacturing Practice and the Australian Standard.*

*I believe that consumers, pharmacies and medical professionals, particularly dermatologists, need the confidence that this system provides. Anything less is a compromise of public health.*

*I would be most concerned if any product that makes any claim for sun protection or SPF could be sold as a cosmetic without this level of control by the TGA.*

Yours sincerely,

*W. Regan*

DR. W. REGAN.