

The Secretary  
Scheduling Secretariat  
GPO Box 9848  
CANBERRA ACT 2601

Email: [chemicals.scheduling@health.gov.au](mailto:chemicals.scheduling@health.gov.au)

Dear Sir/Madam

**Public Comment Submission to the November 2018 meeting of the Advisory Committee on Chemicals Scheduling (ACCS)**


We refer to the notice published on 31 August 2018 inviting public submissions, with respect to certain substances, addressing a matter raised in s.52E of the *Therapeutic Goods Act 1989*.

Accord Australasia Limited is the peak national industry association that represents the hygiene, cosmetic & specialty products industry.

Accord wishes to provide information on the following substances for consideration at the November 2018 meeting of the ACCS:

- 2-chloro-p-phenylenediamine

Please see the attached submission for details.

We look forward to further advice from the ACCS and the Delegate. Should the Committee or the Delegate require any additional information from Accord at this stage please do not hesitate to contact me on .

Yours Sincerely

*[unsigned for electronic submission]*


Rachael Linklater  
**Science & Technical Regulatory Associate**

28 September 2018

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## **ACCS meeting: November 2018**

### **2-chloro-p-phenylenediamine**

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We note the proposal to amend the existing scheduling entries for phenylenediamines in Schedules 6 and 10 in the Poisons Standard to include halogenated derivatives of phenylenediamines.

This appears to be an exercise in clarification, confirming that halogenated derivatives are indeed captured in the existing scheduling entries. This aligns with our current understanding of the entries for phenylenediamines, as without a specific exclusion, all salts and derivatives are captured by virtue of the nature of the scheduling system.

As such, at this time based on our understanding of the proposal, we do not expect any significant regulatory impact.