

18 May 2020

The Secretary

Scheduling Secretariat

Joint Advisory Committee on Medicines Scheduling / Advisory Committee on Chemicals Scheduling

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Dear Sir/Madam

Proposed Amendments to the Poisons Standard (Medicines/Chemicals), June 2020

The Australian Food and Grocery Council (AFGC) is the leading national organisation representing Australia's food, drink and grocery manufacturing industry. The membership of the AFGC comprises more than 180 companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery products sectors in Australia.

The AFGC welcomes the opportunity to respond to the [notice](#) inviting public submissions on scheduling proposals referred to the June 2020 meetings of the Advisory Committee on Medicines Scheduling (ACMS #31) and the Joint Advisory Committee on Medicines and Chemicals Scheduling (Joint ACMS-ACCS #25).

The AFGC's comments to address matters mentioned in section 52E of the *Therapeutic Goods Act 1989* (the Act) are relevant to following chemicals:

2.3 Methylisothiazolinone and methylchloroisothiazolinone

2.4 Isothiazolinones

Initial Comments

AFGC member companies have indicated that a wide range of their household cleaners (including laundry care, dishwashing detergents, bathroom/toilet cleaners, air fresheners and domestic pesticides) are expected to be impacted by the proposed amendments to the Poisons Schedule. Members have indicated initial concerns about the potential impacts for their products containing isothiazolinones (at < and > 0.05% total level of inclusion, noting that substances such as MIT, CIT, BIT, and OIT are used individually and/or in combination) and, the proposed implementation timing.

The AFGC has had the opportunity to review the submission of Accord Australasia to this consultation. AFGC members support Accord's broader comments on:

- the important role of isothiazolinone preservatives;
- the need to maintain availability of a range of preservatives for Australian manufacturing;
- the inconsistency of approach with overseas jurisdictions (GHS hazards versus Australia's risk basis); and
- the requirement for adequate transition times for labelling changes.

Request to Defer

At present, AFGC member companies are fully engaged in managing their responses to the COVID-19 pandemic, with their compelling objective being the maintenance of continuous supply of essential products (such as skin and surface disinfectants/sanitiser). While they do want to provide information (as per section 52E of the Act) and participate in risk/benefit discussions, they are not in a position currently to engage in the complex consultation processes. More time is required to ensure that all affected AFGC members are able to provide input. This rare but demanding situation has been recognised by other regulators with deferrals and/or extensions to consultation timings.

For this reason, the AFGC respectfully requests that the Committees' progression of these agenda items be deferred until the November 2020 meetings. The AFGC is not aware of any evidence that this proposal arises from an urgent public health issue that would require immediate remedy, especially since the new scheduling requirements for MIT and CIT were only relatively recently considered and implemented.

The AFGC looks forward to the response of the Committees and Delegate. For further information about the contents of this submission, please contact me on phone [REDACTED] or kim.tonnet@afgc.org.au.

Yours faithfully



Kim Tonnet
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