



THE AUSTRALASIAN COLLEGE OF DERMATOLOGISTS

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16 September 2019

ARTG excipients project

Scientific Operations Management Section

Scientific Evaluation Branch

Therapeutic Goods Administration

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Online submission

RE: Increased online access to ingredient information: consultation paper

On behalf of the Australasian College of Dermatologists (ACD), thank you for the opportunity to comment on the consultation paper to improve online access to ingredient information. We see great value in ensuring that consumers can make informed decisions about the products they use, through transparent access to ingredient information.

The College is supportive of option 1b: *Publish names of excipient ingredients in the ARTG, except those used in any proprietary ingredient mixes*. This is the better of the options presented, and a vast improvement on the status quo. For example, publishing the exact fragrances of the 26 listed by the European Union, and not just generic "fragrance, parfum, or perfume" would be incredibly helpful to those consumers with fragrance allergy, which is relatively common in the community.

However, the exceptions continue to allow manufacturers to hide allergens in proprietary ingredient mixes. We understand from a manufacturers' view point the effort that it takes to stabilise a formulation and the commercial interest in not publishing the whole list of ingredients. Yet, it is also important for patients and consumers to know exactly what they are getting, particularly when they have skin allergies. Access to as much information as possible is imperative for our Fellows to advise their patients about allergies to their skin care products.

The ACD welcomes the opportunity to collaborate with you to help communicate this information to consumers, through your proposed 'communications champions'. Thank you for your consideration in this matter. If you have any queries relating to this submission please contact [REDACTED] at [REDACTED]

Kind regards,



The Australasian College of Dermatologists