

JAPAN COSMETIC INDUSTRY ASSOCIATION

May 11, 2017

To: Therapeutic Goods Administration
Department of Health
Australian Government

JCIA opinion on the sunscreen regulatory reform

Dear Sirs/Madams,

On behalf of Japan Cosmetic Industry Association representing interests of more than 1,100 cosmetic companies in Japan, I would like to express my sincere appreciation for your endeavor to reform the regulatory framework of low risk products including sunscreens. JCIA is convinced that the regulatory reform is effective for both ensuring consumer protection and encouraging industrial innovation.

JCIA strongly supports the proposal of Option 6 that all sunscreens should be regulated as cosmetics. Sunscreen is categorized as cosmetic widely in various countries and regions such as Japan, New Zealand, India, Russia, Middle East, South American countries, EU, ASEAN. From the point of view of international harmonization, Option 6 is the most and only preferable measures for global cosmetic industry.

We are confident in safety, quality and efficacy of sunscreens by our experience accumulated over long history of use in market. In addition Japanese cosmetic manufacturers are required license and appropriately supervised by local government. Therefore the risk of Option 6 to allow sub quality products being supplied into the Australian market is expected to be minimal.

Reduction of regulatory burden accelerates access to Australian market for global cosmetic industry. It means the regulatory reform facilitates Australian people to use state-of-the-art sunscreens to result in positive impact to public health.

We appreciate the opportunity to provide our views on the proposed options and sincerely hope taking into consideration those comments.

Respectfully yours



Yamamoto Junji
Senior Managing Director
Japan Cosmetic Industry Association

6TH FL., METRO CITY KAMIYACHO, 1-5, TORANOMON 5-CHOME, MINATO-KU
TOKYO, JAPAN 105-0001

TEL: +81 3 5472 2530 FAX: +81 3 5472 2536