27 July 2012

Jurlique International Pty. Ltd. (a member of the Ai Group) wish to provide comment with regard to the options proposed in the Discussion Paper – Review of the National Industrial Chemicals Notification and Assessment Scheme (NICNAS), June 2012.

**Option H1**
Jurlique International support the transfer of responsibility for administration and enforcement of the Cosmetic Standard 2007 to the ACCC. However, Jurlique International recommends NICNAS to provide technical advice to the ACCC in relation to any amendment required to Cosmetic Standard 2007.

Jurlique International recommends NICNAS to remain as the appropriate regulatory body to continue with the assessment of chemicals in cosmetics.

Jurlique International believe that the adoption of Option H1 would not significantly impact the organisation.

**Option H2**
Jurlique International support the introduction of new provisions into the ICNA Act (and on AICS) to specifically deal with chemicals used in cosmetics rather than continuing to treat them like industrial chemicals.

Jurlique International believe the utilisation of a separate inventory of cosmetic ingredients, a list of pre-approved cosmetic ingredients, a list of ingredients not to be utilised (based on risk) and a separate list of data requirements for the assessment of cosmetic chemicals would help provide assistance to the cosmetic industry in identifying chemicals of high risk for use in cosmetic products.

Jurlique International believe referring to international approaches need to be seriously explored as a large amount of assessment has been carried out on the international scene with regard to chemical management for cosmetics. Utilising international assessments of chemicals would help formalise a platform for the reform but Jurlique International supports the incorporation of Australian relevant assessment and management of chemicals when it is deemed necessary or required. This comment above also helps support Option F1 and F2.

Jurlique International believe that the adoption of Option H2 (and Options F1 and F2) would not significantly impact the organisation but provide greater visibility on the type of chemicals allowed for use in cosmetics.

Richard Surynt
Senior Regulatory Affairs Officer