



**Unilever Australasia**

20 Cambridge Street  
Epping NSW 2121  
Private Bag 2  
Epping NSW 1710  
Australia

T: (02) 9869 6100

F: (02) 9869 6150

Dr Marion Healy  
Director  
NICNAS  
GPO Box 58  
SYDNEY NSW 2001

Email: [marion.healy@nicnas.gov.au](mailto:marion.healy@nicnas.gov.au)

Dear Marion,

**AMENDMENTS TO THE SCHEDULE TO THE ACT AND SUMMARY REPORT PROPOSAL**

Unilever Australasia is an international manufacturer and marketer of food, home and personal care products and is a market leader in many grocery categories in Australia and New Zealand. Our well known home and personal care brands include Rexona, Sunsilk, Vaseline, Dove, Omo/Persil, Surf, Domestos and Jif.

We appreciate the opportunity to comment on the consultation document *Further Consultation on Proposed Amendments to the Schedule to the Act and the Requirements to Prepare and Publish Summary Report* (NICNAS Proposal).

Our company is an active member of ACCORD and our views on the NICNAS Proposal and consultation process are entirely consistent with that of our industry association. Hence, we wish to express our **full support** for ACCORD's response to the latest consultation (refer to separate letter dated August 2010).

Unilever shares ACCORD's concern at NICNAS's apparent lack of due process when considering these changes, particularly as there was no evaluation of the impact on industry.

With respect to the amendments detailed in the NICNAS Proposal, our comments are:

- 1) We support the removal of the requirement to publish the *summary report* as long as there is a fully functioning link to the full public report in the Chemical Gazette and key information about the assessed chemical listed in the proposal is published

- 2) We endorse ACCORD's comments on the need for data requirement consistency between TGA and NICNAS for *UV filters* and the mutual recognition of each agency's assessments. There is no justification for the data requirements for a UV filter used in a cosmetic product to be more onerous than the same UV filter being used in a therapeutic good
- 3) We agree with ACCORD's comments regarding *Screening new chemicals for Persistent Organic Pollutants (POPS)*. As this information is likely to be relevant to a small number of new chemicals, it is inefficient and costly to request it for all new chemicals. We understand that NICNAS can currently request further information from the introducer if the new chemical is suspected of being a potential POPS
- 4) We agree with ACCORD's comments on *Public Exposure Information*. No evidence has been provided to demonstrate that the current public exposure data requirements compromise new chemical risk assessments
- 5) We agree with ACCORD's comments on *Clarification of requirements for some physical and chemical properties*. It is our view that NICNAS should consider the current data set and have the flexibility to request more data only when appropriate
- 6) We agree with ACCORD's comments on *Polymer Reaction Scheme*. In many areas NICNAS argues for consistency with overseas agencies, however in this instance it is proposing an Australian only approach, which is an additional burden on industry without any apparent benefit
- 7) We support the retention of *International Union of Pure and Applied Chemistry (IUPAC) chemical names* as acceptable chemical names, however we are disappointed in NICNAS's insistence on CAS chemical names being used for AICS listings. This requirement is not followed in the ARTG or, to the best of our knowledge, in other overseas chemical inventories. We are not convinced that Regulation 5 of the *Industrial Chemical (Notification and Assessment) Regulation 1990* only mandates the use of CAS names

We look forward to receiving the NICNAS response to both the ACCORD submission and Unilever's comments.

Yours sincerely



John Graham  
Assistant Regulatory Manager

16<sup>th</sup> August 2010