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Director  
NICNAS  
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Dear Marion,

**NICNAS COST RECOVERY IMPACT STATEMENT DISCUSSION PAPER**

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 have a keen interest in the questions posed in the abovementioned discussion paper and the implications of the CRIS process.

Our company is an active member of ACCORD and we wish to express our **full support** for ACCORD's recent comments on the discussion paper (refer to separate letter dated August 2010)

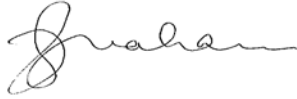
In particular, Unilever has a major concern with the proposed Accelerated Assessment of Existing Chemicals mentioned in Questions 27 & 28. The internal cost and company resources required just for the prioritisation of existing chemicals are substantial and may not be fully appreciated by NICNAS. Many of Unilever's products are imported and non-hazardous with a short lifecycle. The ingredient data related to these products are likely to become inaccurate and/or irrelevant in a very short period of time. Hence, NICNAS assessment effort could be wasted on chemicals that are no longer used in Australia. A large number of our NICNAS permits and certificates are no longer used as the relevant chemicals are now obsolete.

It is our view that low hazard chemicals contained in imported cosmetic products should be excluded from the prioritisation process. Also, the same principles applied by overseas agencies in their existing chemicals programs should be considered for the NICNAS EC program. Simple rules could be applied, such as elimination of non-hazardous chemicals, flavour ingredients, essential oils and

extracts, polymers of low concern etc., which will dramatically reduce the workload for both industry and NICNAS and make the whole process far more manageable.

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

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Graham', with a stylized, cursive script.

John Graham  
**Assistant Regulatory Manager**

4<sup>th</sup> August 2010