

THIS SUBMISSION WAS SENT AS AN E-MAIL ON 23 APRIL 2008 AND HAS BEEN DE-IDENTIFIED AT THE WRITERS REQUEST

Comments in regard to Proposed Changes to the Regulation of Disinfectants

- I do not support Option 1 in the consultant's report because I believe it lowers the level of regulatory oversight too much and will favour marketers making excessive claims to gain competitive advantage in the marketplace. It may lead to a ramping up of the modern obsession with cleanliness which is implicated in increased childhood immune diseases.
- There seems to be little rationale given as to why Option 1 is the preferred option over the other three.
- I am not convinced that Hospital Grade disinfectants making specific biocidal claims should be reduced from registration status, where the data is reviewed by TGA, to listing status, where it may not be reviewed by TGA.
- The Hospital Grade claim and specific biocidal claims are voluntary claims from a commercial point of view and the regulator should give no weight to the supposed unjustified regulatory burden on marketers who choose to make these claims for commercial advantage. It is sensible that marketers should be discouraged from making these claims if they are not prepared to accept the cost of acquiring adequate data and the regulatory oversight required.
- Option 2 seems to be unacceptable because the widely known Hospital Grade claim would become meaningless.
- Option 3 seems to be unacceptable because it would be difficult to regulate and administer.
- **I support Option 4 in the consultant's report** because it maintains a reasonable level of regulatory oversight by TGA for disinfectants where higher level Hospital Grade and specific biocidal claims are made. If marketers don't like this they are free to make lower level claims.

Regulatory Affairs Officer