Industry Statement

Australia’s hygiene products industry responding to the COVID-19 pandemic

In these challenging times it is important adequate supplies of the most essential products are maintained across Australia.

And that this occurs despite disruptions and uncertainty arising from local and global responses to the pandemic.

Products in this essential category include many made and/or supplied by Accord member businesses such as hand sanitisers, disinfectants, food manufacturing sanitisers and all types of cleaning products.

Our members make and supply such products to a wide range of customers including household consumers, food manufacturers, hospitals, medical clinics, aged care, childcare, dairy production and general building cleaning and maintenance.

Unprecedented demand is being experienced for these hygiene products.

And unlike the situation for such consumer products as toilet paper and some medicines, this demand is due mostly to increased usage, rather than stockpiling.

That is why our industry has been working with governments and other key stakeholders to ensure hygiene product adequate supplies by identifying and seeking to address potential supply roadblocks.

Such roadblocks may result from a multitude of factors. Of most relevance presently are:

- ensuring sufficient supply of the most critical product ingredients needed for local manufacture, which could be impacted by:
  - global supply chain disruptions,
  - shipping and logistics constraints locally within ports,
  - demand for other uses; and,
  - the closure of state borders by some state governments; and,
- addressing potential regulatory roadblocks arising from inflexible rules unsuited to the urgency and flexibility needed to meet the unprecedented product demand.

And the most relevant products are hand sanitisers and hard surface disinfectants, especially as used and needed in the health care system.

Also important in meeting the challenge to reduce the spread of COVID-19 is a strong focus on good hygiene practices. For more than a decade Accord has been promoting the importance of good handwashing practice using either soap and water or alcohol based hand sanitiser via our Hygiene for Health website (www.hygieneforhealth.org.au).

Equally important in using any hygiene product is safety. And for this reason, consistent messages on proper use are needed in information to the public. Potentially hazardous and likely ineffective DIY mixtures are not what should be promoted to the public at this time.

Attached is an Industry Action Report outlining our actions to date on meeting the COVID-19 challenge.

25 March 2020

Media inquiries – Craig Brock, Accord Policy and Public Affairs Director – 0422 363 646
Update on the priority responses of Australia's hygiene products industry to the COVID-19 pandemic through the industry body Accord

Industry Action Report #1

Priority action area #1 – ensuring ongoing supplies/access to essential sanitising and disinfecting products

Background

- Public health protection is a primary goal for the industry that Accord represents. Products such as hand sanitisers, hard surface disinfectants and food operation sanitisers will always play vital roles, but never more so than now. Good hand hygiene is paramount to stopping the spread of COVID-19 infection. And equally important for reducing infection risk is proper cleaning with appropriate and effective disinfectants, as and when needed. For this reason, we are seeing unprecedented usage and demand for our industry’s products.

- This is why Accord is liaising across its member businesses, the broader industry and with government to help identify, in an evidence-based manner, likely roadblocks to product manufacture, supply and shipment. And to suggest remedies to overcome these roadblocks, so that the most urgently needed products are available as required to the public, our health system and other essential industries, like food and beverage production.

- Accord will continue to inform government of emerging business issues, primarily via the Australian Chamber of Commerce and Industry, of which we are a member. However, where needed we will also engage directly with ministers, departments and agencies on critical supply chain problems we have identified. Ministers are also pro-actively initiating actions to pre-emptively resolve supply concerns and Accord stands ready to assist with such endeavours.

Potential roadblock #1 – availability of essential product ingredients, especially germicidal active ingredients

- Formulated hygiene products generally comprise an active ingredient kept in a usable form by a range of other ingredients (e.g. the gelling agents in hand sanitisers, which help the active alcohol ingredient do its job). Like most other industries, the contemporary hygiene products industry is highly globalised.

- And this means many ingredients/products come from offshore sources that may be disrupted by global impacts from COVID-19. Ingredient supply disruptions can also result from local policy decisions taken in Australia that have an unintended knock-on effect of impacting logistics/transport and thereby supplies1.

What actions are being taken?

- Initial priority action has been on alcohol-based hand sanitisers, which are urgently needed in a variety of scenarios and especially for the protection of health workers. Ethanol supply is essential for sanitiser products. Accord notes and applauds early attention given to ethanol for hand sanitisers by federal Industry Minister Karen Andrews – see www.minister.industry.gov.au/ministers/karenandrews/media-releases/government-working-industry-hand-sanitiser-production.

- Supply issues for hand sanitisers will be further investigated in a roundtable being convened by the federal Department of Industry, Science, Energy and Resources at the initiation of the Industry Minister. Accord is assembling a panel of relevant business experts in this market to participate in the roundtable discussions. Information we have received from our members indicates that consideration needs to be given to the ongoing availability of important ingredients such as the gelling agents used to make hand sanitiser, as well as ethanol.

- Ongoing monitoring by Accord continues so we can document specific business examples of potential supply issues for various ingredients used in disinfecting and cleaning products. It is important that such information is evidence-based. Examples of potential supply concerns will be shared with government once authenticated.

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1 For example, the unprecedented closure of state borders (SA, Tasmania, WA and Queensland) and restrictions on freight and shipping at some ports.
Potential roadblock #2 – making currently inflexible regulatory rules more flexible in this time of crisis

- Many formulated hygiene products, particularly those with suitable characteristics for use in medical settings during a pandemic, are regulated by the Therapeutic Goods Administration (TGA). Others designed for general consumer use are regulated in Australia as cosmetics under Australian Consumer Law (ACL) while their ingredients are regulated as ‘industrial chemicals’ by the National Industrial Chemicals Notification and Assessment Scheme (NICNAS).

- There are a range of rules applied by these regulators to the making and selling of such products. And these can act to impede businesses from quickly entering the market to meet the currently unprecedented demand for sanitisers and disinfecting products. Additionally, shortages are occurring, or may occur, in product packaging and hardware like in-pack dispensing pumps. Some current regulatory rules set requirements that could impede the easy substitution of packs or pumps with available alternatives.

What actions are being taken?

- Accord has been in active dialogue with the TGA to discuss suitable measures such as expedited administrative arrangements that could streamline regulatory approvals for sanitiser products and disinfectants.

- This process is ongoing and is hoped to deliver improvements that will assist to maintain and increase supply of essential hand sanitisers and hard surface disinfecting products.

Potential roadblock #3 – product testing for effectiveness against COVID-19

- There are some specialty hard surface disinfectant products available on the Australian market that have been validated by testing as effective in killing viruses such as the SARSs virus.

What actions are being taken?

- Accord has been in active dialogue with the TGA to identify suitable surrogate viruses that are presently available for testing in Australia and would be deemed suitable to determine the effectiveness of a disinfectant product against the COVID-19 virus.

- A range of suitable surrogates have now been identified and accepted by the TGA. Businesses interested in finding out more should visit the TGA website: www.tga.gov.au/surrogate-viruses-use-disinfectant-efficacy-tests-justify-claims-against-covid-19 or contact the TGA.

Priority action area #2 – ensuring best possible advice to the public on effective and safe product use

Background

- Product safety is a primary goal for the industry Accord represents. The many benefits that our industry’s products offer in terms of public health protection rely heavily on products being used safely and effectively.

- It is therefore vitally important that safe use messages are correct. Product advice made available to the public, and more generally within the media, must be responsible and consistent with good safety practices. For example, some media articles we have recently seen encouraging DIY sanitisers or disinfectants risk safety hazards for consumers such as a fire risk of high-concentration ethanol or toxicity risks from mixing chlorine-based cleaners. DIY cleaners are also likely to have limited or unproven efficacy in scenarios involving COVID-19.

What actions are being taken?

- Since 2010 Accord has promoted good hygiene product use for infection control via our Hygiene for Health website (www.hygieneforhealth.org.au). We have been updating this site since the start of the COVID-19 crisis to incorporate hygiene messages based on the latest information.

- Dialogue has also occurred with the federal Health Department on appropriate messages for its fact sheets that include advice on suitable hard-surface disinfectants and other environmental cleaning products. This work is ongoing and Accord’s goal is to ensure all publicly available advice is valid and consistent with best safety practices appropriate to the current crisis.

Update #1, 25 March 2020

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