

The Hon Scott Morrison MP
Prime Minister of Australia

The Hon Gladys Berejiklian MP
Premier of NSW

The Hon Daniel Andrews MP
Premier of Victoria

The Hon Mark McGowan MP
Premier of Western Australia

The Hon Anastacia Palaszczuk MP
Premier of Queensland

The Hon Steven Marshall MP
Premier of South Australia

The Hon Peter Gutwein MP
Premier of Tasmania

The Hon Andrew Barr MP
Chief Minister of the ACT

The Hon Michael Gunner MP
Chief Minister of the NT

Dear Prime Minister and State/Territory Chief Ministers

Exempting essential hygiene, personal care and specialty products businesses from lockdown

I am writing to you urgently regarding the industry we represent, the Australian hygiene, personal care and specialty products industry.

The purpose of this letter is to reinforce the essential role that our industry and its products are playing, and will continue to play, in protecting the public, the healthcare system and other vital industries such as food production during the COVID-19 pandemic.

Hygiene, cleaning and personal care products like hand soaps and sanitisers, disinfectants for home and industry, specialist food and beverage sanitisers, toilet cleansers, laundry and dishwash products and all the other types of general cleaning and hygiene products are needed now in sufficient supply, more so than ever.

As you will appreciate, no industry in either the national economy or indeed in any individual state/territory economy is entirely standalone.

Many industries strongly depend on upstream sector industries for essential inputs and supplies needed so that they can make their products.

For essential hygiene, personal care and specialty products this includes the Australian chemical products industry producing here and importing, as well as the Australian packaging, logistics and transport industries.

Critical raw materials are high on this list including ethanol (which is used extensively in a vast array of cleaning and hygiene products), disinfecting agents, enzymes, biocides, surfactants, fragrance and flavouring agents, solvents, gelling agents and other formulation aids.

Likewise, our industry's products are essential to many industries downstream from us, who rely heavily on our industry's hygiene and personal care products to ensure the safe and uninterrupted production and supply of their essential goods and services.

This includes the Australian food and beverage manufacturing industry, the entire healthcare system, dairy and poultry farms plus also the maintenance of safe and sanitary conditions in general manufacturing, grocery and pharmacy retailing, food preparation, water treatment, pest control and in key institutions like aged care facilities.

Also, of course, our industry's products are critical in maintaining clean and sanitary conditions and good hygiene measures within homes and public places.

Businesses across our industry are prepared to do our bit in the battle to slow and control the spread of COVID-19. Given the essential nature of hygiene and personal care products in helping to stop the spread of infection, we strongly feel we can best play our part by remaining open and operational, making essential hygiene and personal care products, being served by those supplying our critical ingredients, and then

supported by those distributing within the many critical supply chains. As you will appreciate there is presently unprecedented demand for all of these products and services.

Accord's member businesses are mindful of the need for measures such as social distancing and other new behavioural changes as they operate. And all due care is being taken to adapt operations so as to limit any situations that could be inconsistent with expert advice on infection control within their business interactions.

Via our association, member businesses are being kept well informed on the latest measures in response to the pandemic. We are also actively facilitating dialogue across the supply chain so that we can best ensure ongoing availability of our industry's many essential products.

For your information I have attached an Industry Action Response report we recently published on this activity aimed firmly at identifying and addressing potential roadblocks to essential product supply. I also attach a list of Accord member companies.

The actions you have been taking in protecting the community and in keeping the economy functioning as best it can in these challenging times is greatly appreciated. Should you or other relevant members of your Government wish to discuss the situation for my industry in more detail please contact me on 0418 384 221.

Yours sincerely



Bronwyn Capanna
Executive Director

27 March 2020

cc. National COVID-19 Coordination Commission Chair, Mr Neville Power

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.

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 SARs 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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Members

Consumer and Personal Care

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| Advanced Skin Technology Pty Ltd | Keune Australia |
| Amway of Australia Pty Ltd | Kimberly-Clark Australia |
| Beiersdorf Australia Ltd | La Biossthetique Australia |
| Chanel Australia | La Prairie Group |
| Clarins Group/Trimex Pty Ltd | L'OCCITANE Australia Pty Ltd |
| Clorox Australia Pty Ltd | L'Oréal Australia Pty Ltd |
| Colgate-Palmolive Pty Ltd | Luxasia Oceania Pty Ltd |
| Combe Asia-Pacific Pty Ltd | LVMH Perfumes and Cosmetics |
| Core Metrics Pty Ltd | Mary Kay Cosmetics Pty Ltd |
| Cosimer Pty Ltd | Muk Haircare Pty Ltd |
| Coty Australia Pty Limited | Natural Australian Kulture Pty Ltd |
| Crabtree & Evelyn Australia | Nutrimetics Australia |
| De Lorenzo Hair & Cosmetic Research Pty Ltd | Panamex Group |
| Edgewell Personal Care | Pierre Fabre Australia Pty Ltd |
| Emeis Cosmetics Pty Ltd | Procter & Gamble Australia Pty Ltd |
| Estée Lauder Australia | Puig Oceania Pty Ltd |
| Frostbland Pty Ltd | PZ Cussons Australia Pty Ltd |
| Givaudan Australia Pty Ltd | RB |
| GlaxoSmithKline Consumer Healthcare | Revlon & Elizabeth Arden Australia |
| Hairjamm Pty Ltd | SC Johnson & Son Pty Ltd |
| Helios Health & Beauty Pty Ltd | Shiseido Asia Pacific Pte Ltd |
| Heritage Brands | Skin Health Pty Ltd |
| Inglot Cosmetics Pty Ltd | The Heat Group Pty Ltd |
| Integria Healthcare (Aus) Pty Ltd | Ultraceuticals |
| International Hair Cosmetics | Ummily Group Pty Ltd |
| Johnson & Johnson Pacific | Unilever Australasia |
| KAO Australia Pty Ltd | Weleda Australia Pty Ltd |

Commercial/Hygiene & Specialty Products

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| Albright & Wilson (Aust) Ltd | Novozymes Australia Pty Ltd |
| BASF | Nowchem |
| BP Castrol Australia Pty Ltd | Peerless JAL Pty Ltd |
| Brenntag Australia Pty Ltd | Recochem Inc |
| Castle Chemicals Pty Ltd | SC Johnson Professional |
| Clariant (Australia) Pty Ltd | Solvay Interlox Pty Ltd |
| Crisp Solutions | Sopura Australia Pty Ltd |
| Dominant (Australia) Pty Ltd | Symbio Australia Pty Ltd |
| Dow Chemical (Australia) Pty Ltd | Tasman Chemicals Pty Ltd |
| E.D. Oates Pty Ltd | Thor Specialties Pty Limited |
| Ecolab Pty Limited | True Blue Chemicals Pty Ltd |
| Indorama Ventures Oxides Australia Pty Limited | Whiteley Corporation Pty Ltd |
| Lab 6 Pty Ltd | |

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Davoren Environmental Pty Ltd

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Merieux Nutrisciences

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Seren Consulting Pty Ltd

Sue Akeroyd & Associates

Tudor Chem Pty Ltd

UL International Australia Pty Ltd

Specialist Laboratories and Testing

D.Lab Solutions Pty Ltd

Eurofins ams Laboratories Pty Ltd

Eurofins | Dermatest Pty Ltd

Innovation Partners

Monash University

March 2020