

Member Value strategy

A responsive and respected team, delivering indispensable services and knowledge across the breadth of membership, focused on stewardship initiatives to maximise sustainability and innovation.

Accord's primary goal is to provide our Members with essential services and business value-add. The key focus areas for our Member Value strategy include new and improved services, such as expanding our event offerings and training options, new and refreshed Member-only information resources, and additional external partnerships with direct benefits to Member companies.

Events

2020 meant that Accord, like most organisations, had to rethink the way we delivered events. We were pleased to be able to offer our Members a greater number of free online events during the reporting period, ensuring continued and exclusive access to both thought-leaders and government officials.

AGM & Industry Briefing 30 July 2020

Our first virtual Annual General Meeting featured special guest Ross Lambie, Chief Economist for the Australian Chamber of Commerce and Industry. Ross' presentation—*Down the rabbit hole: Perspectives on the impact of COVID-19 on the Australian economy*—explored the impacts of the pandemic and the recession, and what all this upheaval means for Australia's economic outlook. The event was also an opportunity to provide Members with an update on Accord's COVID-19 response to date, as well as the association's ongoing priorities.

Manual dish wash consumer insights with Novozymes 16 October 2020

Did you know that 66% of Australians prefer to soak dirty dishes before washing? In this webinar co-hosted with Accord Member Novozymes, participants learned all about the manual dish wash habits of Australian consumers, including their 'pain points' and the potential opportunities for product innovation.

Insight Hour

Accord Insight Hour

In 2020 we introduced our Insight Hour format, an online Member-only offering featuring topical presentations on a range of issues and trends relevant to our membership.

- UK regulatory arrangements for cosmetics under Brexit, with the Cosmetic, Toiletry and Perfumery Association UK | 18 March 2021
- Modern manufacturing initiative opportunities with the Department of Industry's Manufacturing Division Engagement Branch | 11 March 2021
- Modern slavery statement requirements with the Australian Border Force Modern Slavery Business Engagement Unit | 24 February 2021
- Personal care & cosmetic consumer insights with GlobalData | 18 February 2021
- The Australian Government's Ban on Testing Cosmetics on Animals – Retail-level Communications Campaign with the Department of Health, the National Retailers Association, and the Clemenger Group | 10 December 2020
- Clean Beauty: Innovation, compliance and promotion with UL | 12 November 2020
- Collaboration opportunities for industry with Monash University | 29 October 2020
- Post-budget economic update with HSBC's Chief Economist, Paul Bloxham | 22 October 2020

- Update on the National PFAS Position Statement and the National Standard for Environmental Risk Management of Industrial Chemicals with the Department of Agriculture, Water and the Environment | 15 September 2020
- Update on ADG Code 7.7 with the National Transport Commission | 27 August 2020
- Home Care Insights with GlobalData | 13 August 2020
- Hand sanitiser issues with the Department of Industry, Science, Energy and Resources | 21 July 2020
- Briefing on update to GHS 7 with the New Zealand Environmental Protection Authority | 7 July 2020
- The new 'red lipstick effect' with GlobalData | 25 June 2020

Roundtables

CEO Roundtable: Salon and professional haircare products 10 February 2021

The first in our new offering of sector-specific roundtables, this session provided a chance for Accord's salon and professional haircare product Members to discuss the current operating environment, their top priorities and Accord's 2021 plans for this important sector.

CEO Roundtable with the Hon Karen Andrews MP 19 August 2020

Accord invited the Hon Karen Andrews MP, then Minister for Industry, Science and Technology, to address our industry leaders to promote the emerging opportunities for greater investment in Australian-based manufacturing. The roundtable was also an opportunity to discuss the ways in which the business environment, local input costs and regulatory frameworks could incentivise local investment decisions rather than acting as insurmountable, costly barriers.

Training

Regulatory Bites: Bite-sized training on chemicals regulations in Australia

In late-2020 Accord trialled a new online regulatory training concept, Regulatory Bites. Over three fortnights, participants were given a high-level overview, followed by a Q&A session, on the following topics:

- Overview of chemical regulations in Australia
4 November 2020
- Introduction to transport regulations
18 November 2020
- Introduction to WHS regulations (GHS, storage and handling)
2 December 2020

Given the popularity of the pilot program, Regulatory Bites will be returning in 2021 with a series on Chemical Scheduling.

Member Value
Responsive and respected, delivering indispensable services and knowledge, focusing on stewardship initiatives to maximise sustainability and innovation.

Industry Growth
Trusted and credible, facilitating growth and employment via convergence based on no barriers to trade.

Advocacy
Trusted and influential, engaging with all relevant reinforcing industry role in public health, and quality of life.

member companies
accord
hygiene, cosmetic & specialty products industry



Total number of events and training:
19

number of registrations:
720

Regulatory Bites
Bite-sized training on chemicals regulation in Australia

Information

Our regular communications inform Members of key regulatory changes, government policy initiatives, important commercial and industrial developments, breaking media stories and upcoming events. These regular communications include:

- our monthly Regulatory Bulletin, assisting Members with compliance and helping them to stay ahead of the game with advice on forthcoming changes
- our weekly Member Updates, covering off on news, events and need-to-know info
- weekly COVID-19 Updates from the Australian Chamber of Commerce and Industry
- direct email alerts concerning policy briefs and media updates to ensure our Members are kept up to date on a range of important and time-critical issues

Accord Members have priority access to a range of publications including The Salon Guide, GHS Frequently Asked Questions (FAQs), Palm Oil Information Paper, Ethical sourcing and a Microbeads Q&A, all of which provide specific assistance to Member companies. Our Members also have access to a range of Technical FAQs covering the following topics:

- Australian Standards
- Cleaners and sanitisers
- Cosmetics
- Disinfectants
- Measurement
- NICNAS
- Requirements for imported products
- Sunscreens

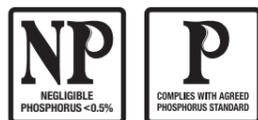
Membership Growth

Accord boasts 101 Member companies, ranging from large global companies to local SMEs. In 2020–21 we were thrilled to welcome five new Member companies: Dalby Bio Refinery, Ensign Laboratories, Eucalip Group, Siemens Australia and Steinberg & Associates.

Sustainability & Innovation Initiatives

Phosphorus Standard

Accord's national Phosphorus Standard, represented by the 'NP' and 'P' on-pack logos, has set sector-wide benchmarks for the phosphorus content in household laundry detergents, contributing to the industry's efforts to protect Australian waterways and driving innovation towards lower phosphorus formulations.



Recognised® – Environmental Credentials Scheme

Recognised® is an independently assessed, science- and evidence-based Accord ecolabel initiative that identifies environmentally preferable commercial cleaning products, including microorganism-based products.

Over 100 products are accredited under the rigorous Recognised® scheme.

www.accord.asn.au/sustainability/recognised



Industry Codes, Guidelines and Reports

Accord's Codes and Guidelines all help ensure industry-wide best practice or assist in the safe use of products, to the benefit of society. They include:

- Hand Sanitiser Industry Benchmark – *published in 2020, check out our COVID-19 report on page 5 for more on this proactive industry initiative!*
- Industry Guideline for Labelling & Packaging of Liquid Laundry Capsules
- Children and Safe Storage of Household Products
- Guide on Cleaners and Sanitisers that may have Incidental Contact with Food – *updated 2020*
- Code of Practice for Household & Commercial Cleaning Products Claiming Antibacterial Action
- Estimating the Relative Contribution of Major Categories of Formulated Household & Personal Care Products to Tropospheric VOC Emissions
- Accord Industry Quality Commitment
- Responsible Supplier Checklist

www.accord.asn.au/sustainability/codes-guidelines

Accord's Plastic Paper: an overview of the international and local landscape

Plastics are receiving an unprecedented level of attention in Australia and around the world. The primary drivers of this are twofold. First, changes to the global recycling market have left Australia in need of fresh solutions for its packaging waste. Second, concerns over levels of plastic in the environment have brought single-use plastics and ingredients such as solid plastic microbeads into the spotlight.

Accord has been actively monitoring and engaging on these issues. This paper summarises the current 'plastics environment' as relevant to the hygiene, personal care and specialty products sector, with a focus on actions undertaken by major international economies, what is happening in Australia, and what Accord is doing.

Ethical Sourcing Information Paper

Accord's Ethical Sourcing Information Paper provide information on what is meant by ethical sourcing and the issues it encompasses, with a focus on the formulated products industry. It is intended as a useful information resource for Accord Members, and specifically for smaller companies that may be less advanced in their ethical sourcing activities.

Accord Industry Quality Commitment

Accord's Commercial Members give their commitment to doing the right thing for customers and the community in four key quality areas: Public and occupational health & safety; Environmental values; Compliance and continuous improvement; and Business ethics/Commercial practices.



Responsible Supplier Checklist

This sustainable purchasing tool for Members is based upon an ideal behaviour model and covers potential purchasing impacts under six key 'Checkpoints'. Organisations can use the Checklist to 'measure up' potential suppliers or themselves, according to their performance across 11 key categories.

Member Surveys

Throughout the year, Accord Members can provide input into a number of survey initiatives. Consolidated results are available to all Members who participate, providing valuable sector data for company decision-making and benchmarking. Many of these surveys also help inform Accord's strategic advocacy priorities and future Member services and provide insightful information about our industry, which can be used to strengthen our dialogue with government and other key stakeholders.

- COVID-19 Business Impacts Surveys – Accord conducted three of these company 'health check' surveys during the reporting period, allowing us to gauge the business environment across the different sectors we represent, as well as determining the longer-term impacts of the COVID-19 pandemic and any ongoing trends across our membership.
- CTFA Salary Survey – this annual survey for Accord's cosmetic, fragrance and personal care Members provides consolidated salary and remuneration information across a broad range of employment positions.

- Frost & Sullivan I&I Cleaning Chemicals Market in Australia, Forecast to 2027 – Accord partnered with international research and consulting firm Frost & Sullivan on their first I&I cleaning chemical market report since 2014, providing our Members with an exclusive 50% discount on the report.
- HR Benchmarking Survey – completed for the first time in 2020, this survey canvassed Accord's consumer, cosmetic and personal care Members on the following areas: paid parental leave, flexible work arrangements and diversity in the workplace.
- Plastics & Packaging Survey Part 1 & 2 – this two-part survey is an extensive information gathering exercise relating to packaging and plastics usage by our industry. Part 1, released in September 2020, gathered high-level information on the types of sustainability policies/measures companies have in place and Member views on the situation in Australia regarding packaging waste policy and infrastructure. Part 2, which is being analysed at the time of writing this report, will provide further information from Members on the design, usage metrics, plastic types, regulatory barriers and other constraints relating to packaging and plastic. These surveys are a critical step in advancing Accord's advocacy on waste and plastic pollution issues into 2021 and beyond, to ensure our industry is in step with the Australian Government and the 2025 National Packaging Targets.

Member Committees and Working Groups

In addition to providing input into surveys and taking part in sector-specific roundtables, Members can also participate on our committees and working groups, including:

- Innovation & Sustainability Executive Committee
- Regulatory Affairs Committee
- AICIS WG
- Antimicrobial WG
- Disinfectants WG
- Hand Sanitiser WG
- Packaging & Waste WG
- Salon Guide WG
- Sunscreen WG

These groups allow Members to get directly involved with the work of the Association, to influence change and achieve the best outcomes for our industry.



Advocacy strategy

A trusted and influential partner, visibly communicating in all relevant fora and engaged with all relevant stakeholders, reinforcing the essential role industry's products play in public health, personal wellbeing and quality of life.

Accord's strategic approach has established our prominent profile with stakeholders and influencers in government, opposition, departments & agencies, and other trade associations. We actively engage with our industry's global and regional networks to maintain current global awareness on key issues in the media and on policy and regulatory matters. We invest in activities that demonstrate our industry's relevance and significance, profiling industry as a solutions provider.

Government & Stakeholder Relations

Accord has built a positive dialogue with Australian governments and officials, operating with professionalism and integrity within a challenging and sometimes contentious policy environment to achieve the right outcomes for our industry. We frame our solutions in terms of the policy priorities and commitments articulated by the Australian Government, supporting these with tangible details

and impacts from our Member businesses. We have raised the industry's issues and concerns via written representations and meetings with ministers, ministerial offices, senior government officials and the opposition.

In addition to meetings and written submissions, Accord draws upon our strong relationships with key government contacts, regulators and external stakeholders through invitations to meet with Accord Members and to present at our events. This allows our Members to engage with key policy- and decision-makers to express their concerns directly.

Voluntary Industry Code to Support the Australian Ban on Testing Cosmetics on Animals

A significant project during the reporting period was the development of the Voluntary Industry Code to Support the Australian Ban on Testing Cosmetics on Animals. From 1 July 2020, the Australian Government ban on the use of new animal test data for cosmetics came into force. To support this ban, Accord was tasked by the Government with the development of the Voluntary Industry Code.

The Code aims to address the findings of consumer research undertaken by the Australian Government, which revealed a lack

of information about animal testing in Australia and consumer confusion about terminologies used by the Cosmetic & Personal Care Industry in relation to animal testing. It is also a resource to assist the industry to meet its obligations relating to the ban and to communicate with consumers with greater transparency and consistency.

The Code was developed in consultation with the Australian Department of Health and other key stakeholders, including the National Retail Association (NRA) and RSPCA Australia, and was expertly drafted by Accord's legal partners at HWL Ebsworth Lawyers. The launch of the Code is scheduled for mid-2021 and has been preceded by a large-scale retail and consumer awareness initiative spearheaded by the NRA, to get the message out about this momentous step forward for the Cosmetic & Personal Care Industry.



Committees & Working Groups

Accord is an active participant on many key committees, representing the views of our Members.

We participated on the Therapeutic Goods Advertising Code Council, Environmental Microplastics WG, AICIS Strategic Consultative Committee (SCC), NMI Consumer and Industry Liaison Committee (CILC), TGA ComTech, TGA Consultative Committee (TCC) and Industry Forum, TGA Industry WG on GMP (TIWGG), TGA GMP Sunscreen WG, TGA Scheduling Policy Framework WG (SPF), NTC Transport of Dangerous Goods Maintenance Advisory Group, and DAWE Biological Consultative Group.

Members of the Secretariat and Accord Member company representatives are active on 15 Standards Australia committees relevant to our industry's interests. Additionally, Dusanka Sabic is Chair of CS-108 Cosmetics Terminology, Australia's representative on ISO TC217 Cosmetics Working Group 4, and a representative on the National Retail Association's Technical Standards Committee. Catherine Oh is an appointed independent expert to the Advisory Committee on Chemical Scheduling (ACCS).

External Networks

Locally, Accord is an active member of the Australian Chamber of Commerce and Industry (ACCI). We also promote collaborative, constructive dialogue on issues of mutual interest with local associations including the Australian Dental Industry Association



(ADIA), Australian Food and Grocery Council (AFGC), Australian Hairdressing Council and other relevant beauty councils, Australian Paint Manufacturers' Federation (APMF), Cement Industry Federation (CIF), Chemistry Australia, Consumer Health Products Australia (CHPA), CropLife, Dairy Australia, Direct Selling Australia (DSA), Food Safety Information Council (FSIC), ISSA (the association representing the cleaning industry supply chain), and the Water Services Association of Australia (WSAA). We are also involved collaboratively with professional organisations the Australian Society of Cosmetic Chemists (ASCC), the Royal Australian Chemical Institute (RACI) and the Australasian College of Toxicology & Risk Assessment (ACTRA).

Academic Partnerships

In 2020-21 we continued our active engagement with Monash University via our Innovation Partnership. To Monash's Graduate Research Industry Partnerships (GRIP) program we delivered training on formulation chemistry and the regulatory systems affecting Accord Member products, and also presented on the 'Impacts of COVID-19 and looking to the future'. We represented the Australian Chemicals Manufacturing Industry at the Monash Institute of Pharmaceutical Sciences (MIPS) Virtual Innovation Showcase. We are also a Partner Organisation of the ARC Training Centre for Green Chemistry in Manufacturing.

Accord is also in the process of finalising a partnership with the ARC Training Centre for the Chemical Industries.



Communication

During the pandemic, Accord's communication shifted to a crisis-footing, becoming more intensified and targeted to keep our Members businesses fully informed. To read more about our pandemic response, see our COVID-19 report on page 5.

Published Articles

We promote and profile Accord and our industry initiatives via selected publications.

Esprit

Training for business performance (Autumn 2021)

Voluntary Industry Code on Animal Testing and Cosmetics (Summer 2020)

Off-the-charts hand sanitiser demand highlights the importance of the personal care industry (July-Sept 2020)

Economic powerhouse (April-June 2020)

Inclean

State of the industry (May/June 2020)

Interview with Bronwyn Capanna as part of Industry Leader's Forum (Industry Leaders Forum Report 2021)

Science of Beauty

Off-the-charts hand sanitiser demand brings challenge and opportunity (June/July 2020)

Promoting the STEM in personal care and hygiene (Nov/Dec 2020)

Education & Sustainability

hygieneforhealth.org.au

Hygiene for Health provides evidence-based information on the vital role of the cleaning and hygiene products industry in preventing the spread of infection and illness throughout our community. The website addresses the role of hygiene products in personal care, households, public spaces, hospitality, healthcare and industry.



Furphies.org.au

Furphies helps address unfounded public alarm about the safety of our industry's products by taking an evidence-based approach to address the common myths and misconceptions about these products.



BeadRecede

BeadRecede is a voluntary Accord initiative to raise awareness and foster industry engagement in meeting calls by Australian environment ministers for the voluntary industry phase out of plastic microbeads in personal care, cosmetic and cleaning products.

Validation of the success of this initiative came in March 2021 with the announcement of the Government's National Plastics Plan. The Plan acknowledged a recent in-store survey conducted in the second half of 2020, which showed 99.3% of products surveyed were 'microbead-free', concluding that for cosmetics, personal care and cleaning products, microbeads were 'phased out'.

This was also echoed in comments made by the Assistant Minister for Waste Reduction and Environmental Management, the Hon Trevor Evans MP, to *The Guardian* in March 2021, who argued that the cosmetic and personal care industry's successful voluntary phase-out of microbeads showed that voluntary approaches could work.

Our sincere thanks to all Members who committed to the microbead phase out and supported Accord's *BeadRecede*. Your efforts have resoundingly helped to boost your industry's reputation for quality, ethics and sustainability

www.accord.asn.au/sustainability/beadrecede



Careers in our Industry

The Careers page on the Accord website is aimed at STEM students and graduates to highlight the opportunities in the hygiene, personal care and specialty products industry for those with STEM interests and skills. The page is broken up into four main parts: 'What kind of products does our industry make?', 'What STEM is involved in our industry?', 'STEM careers in our industry', and 'Tips for STEM job-seekers'.

wipesmart.org.au

WipeSmart is a consumer education initiative to promote better use and disposal of wet wipes. This forms part of our industry's stewardship approach to foster the more sustainable use of important everyday hygiene products. WipeSmart provides many timely reminders about what can go wrong if you flush the wrong types of wipes.



sunsible.org.au

SunsibleTM is all about staying sun safe with sunscreens. It is a consumer-focussed, brand-neutral website promoting the essential role of sunscreens for health protection, addressing common questions and misconceptions about sunscreen with practical tips on staying sun safe.

www.sunsible.org.au



washwise.org.au

WashWise provides a wealth of information on sustainable laundry practices and assists consumers in using laundry products correctly.

The site provides tips and tricks for doing the laundry for Australians who value a great clean, the environment and saving money.



'What's in it?' Household cleaning product ingredient disclosure

'What's in it?' provides consumers with ingredient information to aid choice and enhance confidence in household products. 'What's in it?' covers air care, automotive cleaners, household cleaners, household floor maintenance products and laundry products.

www.accord.asn.au/sustainability/whats



International Collaboration

Accord has fostered strong relationships with international counterparts to facilitate the exchange of timely information and leverage their expertise and resources on industry issues.

Our global network includes sister associations in Canada, Central and Latin America, China, Western and Eastern Europe, India, Indonesia, Japan, Korea, Malaysia, New Zealand, Philippines, South Africa, Taiwan, Thailand, the UK, and the USA. We also have a strong dialogue with the International Fragrance Association (IFRA).

In the cleaning and hygiene sector, Accord is part of the International Network of Cleaning Products Associations (INCPA) and the Asia Oceania Soap and Detergents Association Conference (AOSDAC). We also promote and profile Accord and our initiatives through presentations at selected international conferences, participating virtually at ACI's Annual Meeting and Industry Convention (January 2021) and HCPA's Annual Meeting (December 2020).

Our cosmetic sector networks include the International Communications Network and International Associations Collaboration (IAC). In early 2021, Accord was honoured to take on the Secretariat role for the IAC. Regionally, Accord is also an Associate Member of the ASEAN Cosmetics Association. In February 2021 we also participated on the APAC panel at the virtual IFRA Global Fragrance Summit.

Regionally, Accord represents the Australian downstream chemical industry at the Asia-Pacific Economic Cooperation Chemical Dialogue (APEC CD), a high-level regional forum on issues affecting chemical-based products. Within this forum we participate on three virtual working groups on Regulatory Cooperation, GHS and Data Exchange.



Industry Growth strategy

A well-connected and credible industry voice, facilitating economic growth and employment by supporting global regulatory convergence based on sound science, commitment to regulatory best practice, and no barriers to trade.

We ensure industry's voice is heard through active involvement in regulatory policy decision-making, consultation and national policy development, as well as local and international standards development. We adopt a principled, evidence-based approach to our policy inputs and representation, harnessing local industry partnerships and relationships with key policymakers to achieve a business environment with minimum, effective regulation.

Lighter Touch, Lower Cost, Faster to Market

AICIS implementation

1 July 2020 saw the long-awaited implementation of the new Australian Industrial Chemicals Introduction Scheme (AICIS), replacing the National Industrial Chemicals Notification and Assessment Scheme (NICNAS) as the national industrial chemicals regulator.

Looking forward, Accord will continue to develop guidance materials and work with the regulator to provide relevant training on the new system to assist Members' understanding and compliance.

Accord's official position during the consultation period was that of maintaining the status quo for fees and charges for the first two years of the new system. Regrettably, the regulator's fees increased rather dramatically for some Members, with such increases coming at a time where many cosmetic and personal care companies were experiencing considerable economic hardship arising from the pandemic.

While this push for a freeze of fees was not successful, Accord did achieve some wins for the AICIS implementation, including:

- Extended two-year transition period for companies
- Simplified improvements for fragrances and flavours ingredients
- Successfully advocated for a review of costs, with the Minister in charge of AICIS promising a 12-month review of the new system. Accord was able to provide case studies to the Minister to support the need for the review, highlighting the issues and additional workflows that the new scheme imposes on the formulated products industry

We have also congratulated the Morrison Government on the very welcome announcement of the *Deregulation Budget Package and Regulator Performance Guide*, in particular, the 'Best practice for regulator cost recovery: Increasing regulator transparency and efficiency' project. All of the many sensible and well-targeted measures in this announcement will help support a business-led economic recovery. Given the importance of our sectors in both the economic recovery and delivery of essential products, as well as a significant employer, it is timely to consider improvements to AICIS' operational productivity, resource efficiency and cost framework, and the announced project would seem to be an ideal vehicle to achieve this.

Therapeutic goods regulatory reform

Accord continues to work with the TGA to reduce the regulatory burden on Members' low-risk products such as disinfectants, sunscreens and their ingredients.

For sunscreens, Accord successfully intervened following the TGA's proposal to increase data requirements for sunscreen ingredients. The proposal would have put these requirements essentially on-par with those for registered medicines—a significant and over-the-top regulatory burden for sunscreen Member companies. Pleasingly, due to our advocacy, the regulator has agreed that its focus will be on the update of the Australian Regulatory Guidelines for Sunscreens (ARGS), with the TGA and industry representatives forming small working groups to address each key area of the ARGS and other issues identified with the evaluation of sunscreen ingredients.

As an active member of the Therapeutic Goods Advertising Consultative Committee (TGACC), Accord continues to push for the removal of our industry's low-risk products from the TGA Advertising Code, arguing that the advertising obligations under Australian Consumer Law are sufficient for products of low risk.

Accord also developed a draft guidance paper on cosmetics regulations, advertising claims, and navigating the interface with therapeutic goods legislation for the TGACC's consideration.

Our involvement in the TGACC allows us to uniquely assist our Members in understanding their advertising requirements. The critical review of the TGA Advertising Code will be a significant work area for Accord into 2021.

We are also active participants in the TGA's Industry Working Group on GMP (TIWGG) and its subcommittee on sunscreens, as well as the Complementary and OTC Medicines Regulatory and Technical Forum (Comtech), resulting in the regulator's greater understanding of Accord Member issues and specific reform proposals.

During the reporting period, key achievements were our successful negotiation with the TGA to progress Members' issues with disinfectant regulations, pandemic-related supply chain issues, surrogate testing regimes, biologicals in medical devices, hand sanitiser registration processes and, importantly, the publication of lists of approved disinfectants against COVID-19. As a result, there are now over 200 products available with TGA approved claims against the virus. *You can read more about Accord's COVID-19 response on page 5.*

The Accord Secretariat keeps Members abreast of ongoing changes and reforms for the range of relevant therapeutic goods we actively represent through regular updates in our very popular monthly Regulatory Bulletin.

Agricultural and veterinary (Agvet) products regulatory reform, including dairy sanitisers

Accord continues to work with the Department of Agriculture, Water and the Environment (DAWE) and the Australian Pesticides and Veterinary Medicines Authority (APVMA) on the implementation of Agvet reforms, to provide a better regulatory framework for the industry.

Following the proposal for a restructured national Agvet regulatory framework, Accord has been holding meetings with individual Member companies likely to be affected by the reform proposals or with an interest in Agvet issues, to assist in developing Accord's response. Accord provided an initial submission in August 2020, and a subsequent submission in February 2021 on the Draft Consultation Report's 139 recommendations, released mid-December 2020. Accord was generally supportive of most recommendations.

Accord also actively participates in the APVMA Cost Recovery Working Group, which was established to develop a new costing model for the APVMA following industry concerns with the regulator's cost recovery processes. The new model is expected to commence mid-2023. Due to industry lobbying, the new fees and charges introduced on 1 July 2020 were only modest increases. Accord continues to work with the APVMA to help ensure that Members experiencing supply chain difficulties can have a streamlined pathway. In late 2020, Accord and the APVMA established regular catch-up meetings, directly involving Members, to discuss issues of mutual interest.

Trade measurement and pre-packaged goods labelling reform

Accord continues to engage with the government to achieve greater flexibility with unit measure placement and unnecessary over-labelling of imported products through the National Measurement Institute (NMI). Accord has continued its discussions; however, public consultation is yet to commence regarding the review of the national measurement legislation to be announced later in 2021.



Transport and labelling of dangerous goods

Accord continues to work closely with the National Transport Commission (NTC) for the best outcome for Members. We are building on our previous regulatory reform success in the removal of unique Australian requirements that add regulatory burden, as well as advocating for a simpler, more efficient regulatory system for the transport of lower-risk dangerous goods.

Accord made a submission to the NTC Issues Paper, examining the legal framework for the land transport of dangerous goods and seeking a more efficient and internationally aligned system that is transparent and accountable. The NTC briefed Accord Members on the proposal and the ADG 7.7 changes at an Accord Insight Hour in August 2020.

Accord will continue to identify and advocate for removal of unique Australian requirements that add regulatory burden. For example, as a consequence of Accord's advocacy, ADG Code 7.7 now includes removal of inner packaging testing requirement that applied only to Australian filled products, and amendments to Limited Quantities provisions to streamline the requirements for all limited quantities (including aerosols) are also now in force.

Biosecurity

Accord continues to articulate the need for clear biosecurity risk identification and appropriate mitigation strategies for Member products to the Department of Agriculture, Water and the Environment, raising the need to exclude low-risk formulated chemical products from biosecurity requirements. An update was provided that the legislative drafters were working on this; however, the draft may not be available for public consultation prior to implementation. Utilising specific cases and examples where we had assisted Members, we highlighted the need for clear articulation of biosecurity risks, especially where the expectation of the regulator diverges from the regulatory requirements.

International Alignment

New Zealand Environmental Protection Authority (EPA)

Accord continues to represent Members' views on the reform implementation of New Zealand's hazardous chemicals regime administered by NZ EPA. We provided support for the internationally convergent adoption of the 7th revision of the Globally Harmonised System for the Classification and Labelling of Chemicals (GHS 7) via our submission to NZ EPA in April 2020. We also organised an Insight Hour with the EPA in July 2020, providing an opportunity for Members supplying products into New Zealand to hear first-hand about the proposed changes and potential impacts for their business.

Chemical scheduling

Accord provides regular input into the chemical scheduling process via the TGA public consultation process and through direct engagement with the TGA. We ensure Members are kept up to date on both upcoming consultations and scheduling decisions via the Regulatory Bulletin and targeted email alerts.

Accord responded to scheduling proposals for eight chemical ingredients of relevance to Members, providing seven submissions to the Scheduling Committee.

After the TGA's decision not to progress with recommendations to improve the harmonisation of the Poisons Standard (SUSMP) with international standards such as the International Fragrance Association (IFRA) standards, Accord utilised the Freedom of Information Act to access stakeholder comments to the public consultation that preceded the decision. The aim was to better understand the concerns of other stakeholders so that Accord's next application could address these.

Accord is also commissioning further work on international alignment of public health ingredient controls via scheduling. This is primarily to better align with the restrictions of the European Union Cosmetic Regulation Annexes, as well as those of other key markets.

Work, health and safety (WHS)

The timeline for the implementation of GHS 7 was impacted by COVID-19 due to state and territory workplace regulators shifting their focus to the pandemic response in the early part of 2020. The initially announced implementation date of 1 July 2020 was pushed back six months to 1 January 2021, with a two-year transition period. No relabelling of products is required for products labelled before 1 January 2021.

Accord, through ACCI, encouraged Safe Work Australia (SWA) and state and territory workplace regulators to issue exemptions to allow industry to comply with GHS 7 from the initially planned implementation date of 1 July 2020 to minimise any impact on companies that were working to the 1 July 2020 timeline. Agreement for a national exemption was reached at the SWA meeting and SWA provided the collated state and territory exemption information on their website.

Facilitate Trade and Commerce

Australian Competition and Consumer Commission (ACCC)

Accord has maintained ongoing dialogue with the ACCC on the regulation of alcohol-based hand sanitisers that are not therapeutic goods, including potential changes to labelling requirements such as mandatory disclosure of alcohol concentration.

Despite industry's concerns, the ACCC moved ahead with an update to the Information Standard in November 2020. However, because of Accord's advocacy, compromise was reached on a number of other issues including broadening the definition of alcohol, an extended transition time and reducing required warning statements from 6 to 5

Industrial Chemicals Environmental Management (Register) Act 2021

Legislation to establish a National Standard and Register of industrial chemicals based on environmental risk passed the Australian Parliament and into law on 26 March 2021. Accord cautiously supported the passage of this legislation in principle but raised concerns about cost imposts and potential red tape burden via our submission to the Australian Senate in January 2021.

Accord is engaging intensively with the federal Environment Department to help guide the development of the associated regulations and cost-recovery arrangements. The key principle we are pursuing is that the Register's focus must be on known high-risk chemicals that are likely to be of environmental concern, such as those subject to international treaties, rather than lower-risk chemicals with little chance of any significant environmental release.

Free trade agreements & more

To facilitate export opportunities for Member companies (and to continue to highlight the lack of international alignment of the Australian regulatory system), Accord has assisted with the establishment of Free Trade Agreements (FTA) and Regional Trade Agreements for industry products within the European Union, the Regional Comprehensive Economic Partnership, the Pacific Alliance and the Comprehensive and Progressive Agreement for Trans-Pacific Partnership. Accord held discussions with sister organisation UK CTPA and UK CPI to discuss possible collaboration on relevant annexes for the forthcoming discussions on the AU/UK FTA. Cosmetics NZ has also agreed to seek alignment with the AU/UK FTA and NZ/UK FTA for cosmetics.

In May 2021, cosmetic regulations in China will undergo a fundamental change. New rules coming into effect will seemingly allow an exemption for mandatory animal testing for imported 'general' cosmetic products, if the manufacturer has a third-party GMP certification from a competent government/regulatory authority. Accord is proactively exploring solutions for our exporting Members to facilitate this potential new market opportunity for the cosmetic industry.

