



Advocate for the Consumer, Cosmetic,
Hygiene and Specialty Products Industry

Mr Robert Fitzgerald
Presiding Commissioner
Consumer Policy Inquiry
Productivity Commission
PO Box 80
BELCONNEN ACT 2616

Email: consumer@pc.gov.au

Dear Mr Fitzgerald

ACCORD is pleased to provide the following comments in relation to the Productivity Commission's (PC) inquiry into Australia's consumer policy framework. ACCORD's previous submission on product safety should also be taken into consideration particularly in relation to our recommendation for a national single system administered by the Commonwealth.

ACCORD supports a single national trade practices law administered by a single national regulator in the area of not only consumer product safety but also consumer protection and enforcement which would be administered by the Australian Competition and Consumer Commission (ACCC). A single national system would significantly reduce inconsistencies and duplication in legislation across the jurisdictions; make it easier for the Government to respond to changing market situations and consumer demands; and to harmonize with international practices.

ACCORD Australasia is the peak national industry association representing the manufacturers and marketers of formulated consumer, cosmetic, hygiene and specialty products, their raw material suppliers, and service providers. ACCORD Members market fast-moving consumer and commercial goods primarily in Australia and New Zealand.

Our industry's products play a vital role in:

- keeping our households, workplaces, schools and institutions clean, hygienic and comfortable;
- personal hygiene, grooming and beauty treatments to help us look and feel our best;
- specialised uses that assist production and manufacturing to keep the wheels of commerce and industry turning; and
- maintaining the hygienic and sanitary conditions essential for our food and hospitality industries and our hospitals, medical institutions and public places.

These benefits are essential to safe, healthy living and maintaining the quality lifestyle we all too often take for granted.

With an estimated \$10 billion in annual retail product sales, the formulated consumer, cosmetic, hygiene and specialty products industry is a significant part of a prosperous Australian economy.

ACCORD Australasia Ltd (formerly ACSPA) ACN 117 659 168 ABN 83 205 141 267
PO Box 290 BROADWAY NSW 2007
Tel: 61 2 9281 2322 Fax: 61 2 9281 0366 Website: www.accord.asn.au

Innovative solutions for healthy living and a quality lifestyle

We are a dynamic and growing industry, employing Australians and - through our industrial and institutional sector - supplying products essential for Australian businesses, manufacturing firms, government enterprises, public institutions, farmers and consumers.

Australia operates in a global market and Australia's consumer policy framework must recognise that many products are fully imported from comparable trading partners. Requiring additional unique Australian requirements such as product labeling or unit measure is no longer necessary as Australian consumers also operate in the global marketplace and are able to source products on-line and direct from overseas suppliers. These unique trade and unit measurement requirements are now an anachronism to the market reality of consumer transactions vis a vis global trading.

An unsafe product can effectively destroy a brand and therefore have a significant detrimental impact on the company. Similarly any false or misleading or deceptive actions can also have dire consequences on market share and consumer confidence. It can take years to re-establish in the market following a consumer backlash to an unsafe product or perceived inappropriate behaviour. Our members are therefore extremely diligent and pro-active in the management of their brands and consumer issues including product safety.

Our industry has more than 50 manufacturing operations throughout Australia and member companies include large global consumer product manufacturers as well as small dynamic Australian-owned businesses.

A list of ACCORD member companies is provided at *Attachment 1*.

ACCORD, on behalf of its Member companies, has a specific and direct interest in the review of Australia's consumer policy framework particularly with its focus on reducing regulatory burden and regulatory complexity and welcomes the opportunity to provide this submission for the Productivity Commission's consideration in the development of its Draft Report.

General Comment

ACCORD's approach to regulatory efficiency

ACCORD supports the Australian Government's approach to regulatory best practice and recommends that the Council of Australian Governments (COAG) Principles and Guidelines for National Standard Setting and Regulatory Action by Ministerial Councils and Standard Setting Bodies (COAG Principles) should be rigorously applied in the consideration of any regulatory response to a perceived market failure. ACCORD supports the following as good regulatory practice principles.

Regulatory solutions should:

- be the minimum required to achieve the stated objectives;
- adopt a risk management approach to forming and administering regulation;
- minimize the impact on competition;
- be compatible with international standards and practices;
- cause no restriction to international trade;
- be developed in consultation with the groups most affected and be subject to regular review;

- be flexible, not prescriptive and be compatible with the business operating environment;
- standardize the exercise of bureaucratic discretion; and
- have a clear delineation of regulatory responsibilities and effective and transparent accountability mechanisms.

Our approach in this regard is consistent with the guiding whole-of-government principles we advocate all departments and agencies should follow whether (and when) considering regulatory action – that is, the Council of Australian Governments (COAG) Principles and Guidelines for National Standard Setting Bodies (COAG Principles). ACCORD recognises the importance of well established consumer protection laws to enhance consumer confidence in the market place. ACCORD supports a national approach to consumer policy and protection and believes that there should be one national regulator rather than the current framework for Commonwealth, state and territory responsibility.

ACCORD supports the principle that where an Act of general provision provides adequate regulatory control, these measures should not be duplicated by legislation targeted at a specific sector or industry. This is consistent with Australian Government's approach to regulatory best practice as recommended by the COAG Principles.

ACCORD's members are required to deal with a large number of regulatory agencies. In some instances, this is primarily because industry specific legislation has been developed duplicating the existing law of general provision, for example, the therapeutic goods legislation mirrors areas of the *Trade Practices Act 1974* (TPA) regarding product safety, product recall and advertising. ACCORD does not support the establishment of these industry specific consumer protection provisions and believes that the TPA can more than adequately accommodate these provisions duplicated in other Commonwealth Acts.

ACCORD suggests that there is an argument for a case study to examine the costs of duplication of these provisions within Commonwealth legislation such as the therapeutic goods legislation. ACCORD members have an interface with all the major Australian Government regulators and any streamlining and/or consistency in these areas has the potential to produce benefits through reduced regulatory burden.

In another example of possible duplication, the Department of Health will have responsibility for the regulation of products which will not be part of the proposed Australia New Zealand Therapeutic Products Agency (joint agency) but are currently regulated by the Therapeutic Goods Administration (TGA). Some of these products such as tampons and household disinfectants are fast moving consumer goods. The current proposal is that these will be regulated by the joint agency on behalf of the Australian Government as Australian only products.

The joint agency will have its own scheme for the management of advertising and we understand that these Australian products will not be part of that scheme. To avoid unnecessary duplication and establishment of an unnecessary regulatory scheme for the regulation of these products, ACCORD has suggested a self-regulatory approach for complaint handling already used in Australia by the Australian Advertising Standards Council. This provides industry standards and guidance and an adequate complaints mechanism for consumers and the industry and is underpinned by the TPA. We have recommended that the Department adopts this approach for these low risk, fast moving consumer products rather than duplicate the advertising arrangements proposed for the joint agency more generally.

ACCORD asked the Department in 2006 as to why a separate scheme needs to be developed for these products when we believe that the current controls for the advertising of consumer products

and redress system for the handling of complaints is more than suitable. We have not received a response to date some six months later.

ACCORD provides the following specific comments in relation to specific issues regarding Australia's consumer policy framework.

Product labeling

Trade Measurement

ACCORD's members have noted the lack of consistency in the application of the uniform trade measurement regime for Australia. ACCORD has raised this issue in its various submissions to current government reviews on regulatory reform and has recommended that:

... all jurisdictions adopt the policy and practice that where imported products already meet the regulatory requirements of Australia's comparable trading partners then no further specific requirements should be applied.

ACCORD therefore welcomes COAG's decision regarding the establishment of a national trade measurement regime to be administered by the Commonwealth in response to the review conducted by the Ministerial Council of Consumer Affairs (MCCA). We therefore re-iterate our earlier points regarding implementation of a national trade measurement system, particularly with regard to the abolition of unique Australian trade measurement labeling requirements for fast moving consumer goods. The establishment of the national regime will provide an opportunity to harmonise international trade and unit measurement requirements with that of our major trading partners.

The cosmetics industry, for example, is global, characterised by companies marketing branded products across international boundaries. Australia accounts for about 1.2% of worldwide sales of cosmetic products, with many cosmetics imported as fully formulated and packed products.

With global markets having expanded and the principle of regulatory harmonisation having been adopted by many governments, multinational companies aim to develop and sell new products around the world as quickly as possible.

Many of these products, particularly in the cosmetic, personal care and devices area are imported from Europe, the USA, the UK, Japan and Canada and have already been assessed for public health and safety outcomes. Australian trade measurement agencies currently require additional controls such as the placement of the unit measurement mark on the front of the label. Many of these additional requirements do not contribute to safety or improved consumer knowledge but add costs and barriers to the importation of innovative products into the Australian marketplace.

Example 1: 'burdensome' unique Australian regulatory requirements

There are a number of 'burdensome' unique Australian regulatory requirements which ACCORD's members are required to deal with, and are typical for the cosmetics and personal care sector. A case study was provided in the various submissions on regulatory reform to provide a good idea of the additional requirements and complexity faced by one ACCORD member company in the cosmetics sector on a day to day basis. ACCORD has included the relevant section on weights and measures for your information.

'The Australian industry is required to incorporate these requirements specifically into dedicated packaging for the Australian market for products which are of low risk.'

- **Weights & Measures Regulations:**

- *the need to have the measurement marking on the front panel of the article where the back or side alone is not sufficient.-. this requires overlabeling for products from the EU;*
- *the need to have the measurement marking of aerosol products in grams where mL alone is not sufficient - this requires overlabelling for products from the EU and the USA;*

All the issues listed above require us to either go to the lengths of having our own packaging artwork for Australia, which is not a very large market and therefore the costs are high for us, or overlabel our products often with two or more overlabels per product. To have our own packaging, we need to order large quantities of stock to justify the dedicated production run and this can result in high overstocks in our warehouse as well. The overlabelling of products results in double-handling which poses a logistical obstacle which is time-consuming and expensive.'

Example 2 – lack of national consistency in trade measurement

In another example specific to NSW of difficult regulation, an ACCORD member has advised the following:

'This is a good example of a complicated regulation for soap bar and soap tablet marking for industrial type bars.

The NSW Trade Measurement Regulation 2002 (Sections 80, 85 and 87)

These Regulations specify that bar soaps and personal soap tablets (medicinal or toilet) that are repacked may be marked as either "Mass when packed" together with the mass of the bar/tablet or marked with just the mass of the bar/tablet. If marked with just the mass of bar/tablet then the permissible actual deficiency in mass allowed is 5% and the average deficiency is nil at any time of measurement. Alternatively if marked with "Mass when packed" then the permissible actual deficiency in mass allowed the day after the article is packed is 21% for bar soap and 11% for personal soap tablets and the permissible average deficiency in mass the day after the article is packed for bar soap is 16% and for personal soap tablets 6%. Documentation demonstrating this may be required.

b) Here is another different example where the requirement to include Net or Gross after the unit measure was deleted from the State Trade Measurement Regulations 10 years or so ago but it was not deleted from the Commonwealth legislation and now the Federal Commerce (Import) Regulations discriminates against imported products.

The Federal Commerce (Imports) Regulations 1940 (Section 8)

These Regulations require all imported articles where a weight or quantity is set out in the trade description that the trade description shall state whether the weight or quantity so set out is gross or net.'

The Australian requirement for measurement marking on the front of packets of fast moving consumer goods is outdated. Given that consumer protection requirements for cosmetic labelling require ingredient labelling on the back or side of these products it is ridiculous to continue to insist that unit measure remain on the front label when consumers read the back of the product container for ingredients.

While the logic for the introduction of unit measure on the front of the pack can be understood within the time context of which it was introduced, Australian consumers have become much more sophisticated regarding packaging. ACCORD does not believe that products which fall under the Trade Practices (Consumer Products Information Standards) (Cosmetics) Regulations 1991 (Cosmetic Regulations) should be required to have unique Australian unit measure labelling on the front of the pack.

Australia should accept pre-packed consumer goods which comply with the relevant labeling requirements of Australia's comparable trading partners without any additional labeling requirements. This would also do away with the current requirement for the markings of measurement to be placed on the main display panel; the substitution of grams for mls; and introduce flexibility into the system comparable to that of the European Union (EU) and the United States of America.

Acceptance of deemed to comply provisions

The Australian and New Zealand markets are too small to create and sustain a unique regulatory regime which is out of step with our major trading partners. Recognising this, the New Zealand Government recently introduced a range of reforms for the classification and approval of hazardous chemicals which accepts products that meet the labeling requirements of other nations.

Part 6A of the Hazardous Substances and New Organisms Act (HSNO) 1996 establishes a new regulatory control called a Group Standard. A group standard is an approval under HSNO for a group of hazardous substances of a similar nature, or type or having similar circumstances of use and is risk based rather than solely hazard based. The risk of substances in the group standard will be managed by a single set of conditions rather than by the controls set out in the HSNO regulations.

Within the Group Standard acceptance of other regulatory decisions has been made possible through the use of alternate compliance measures for labeling which accepts products that meet the labeling requirements of Australia, the USA, Canada, the EU or any other country approved by the Authority. The following is an example of the provision as it appears in Group Standards:

Alternative compliance measures for labeling

(15) The requirements of subclauses (1) to (14) do not need to be met if a substance complies with—

- (a) the relevant identification provisions in the Hazardous Substances (Identification) Regulations 2001, the Hazardous Substances (Emergency Management) Regulations 2001 and the Hazardous Substances (Disposal) Regulations 2001; or
- (b) a code of practice approved by the Authority under section 78 of the Act that specifies requirements equivalent to those set out in subclauses (1) to (14); or
- (c) the UN Globally Harmonised System of Classification and Labeling of Chemicals (GHS) and the requirements of subclause (2); or
- (d) the relevant current labelling requirements of Australia, USA, Canada, the European Union or any other country as approved by the Authority, as if the substances were for sale or supply in those countries, and the requirements of subclause (2). (16) Subclause (15)(d) expires with the close of 31

December 2010. (*Food Additives and Fragrance Materials (Combustible)
Group Standard 2006*)

Given Australia's new trade agreements such as the American Free Trade Agreement, unique Australian labeling requirements for trade measurement for imported products may not be consistent with the aims of such trade agreements, given that there are no compelling public health and safety reasons for maintaining these unique requirements. ACCORD believes that pre-packaged consumer goods such as cosmetic or personal hygiene products entering the country should be accepted either through deemed to comply provisions or alternate compliance measures introduced into the national trade measurement legislation and for cosmetic labeling as outlined below.

Obtaining aggregated data on the value of sales for the Australian cosmetic and personal care industry is extremely difficult as there are multiple data sources disaggregating the retail sector into various components. Most of this data is proprietary.

The estimated value of cosmetic and personal care products sold in Australia through major grocery outlets is \$720M with a sale of 130M units (Data is based on the value of sales from 2004, 2005 and 2006 data based on actual sales at grocery stores using the regular retail price. This data excludes sales data from pharmacy and mass merchants)

Example 3 – ACCORD Member costs of over labeling:

One ACCORD Member estimates the cost to over label a product because of a unique Australian requirement costs approximately 50cents/unit. Based on the number of units sold in Australia in 2006, i.e. 130M the additional costs to industry in any one year, could be as high as \$65M.

Similarly, another ACCORD Member advised that over labeling of products, both primarily and secondarily, which involves the double-handling of the product affecting the quality and retail image of the product (i.e. removal of cellophane, removal of jar from carton and application of sticker to front and back jar label, application of sticker to front and back of carton). Using a particular product example, 7,300 units ordered requiring local over labeling where the cost of compliance affected the profit margin by a 9% loss on the net profit for this product.

Labeling changes can be costed - it ranges from \$25k to \$75k depending on the type/quality/extend of packaging.

It is clear from the data provided that any reform which reduces the requirement on industry to over label because of unique Australian labelling requirements, will have a positive benefit on the sector. Reduced compliance costs will result in lower prices to the consumer. It will also enable the introduction of innovative, niche products as it will reduce barriers to entry.

Introduction of the average quantity system

The Queensland Department of Trade Measurement in the Office of Fair Trading has undertaken work on behalf of the MCCA for the introduction of the Average Quantity System (AQS) for the measurement of pre-packed articles. It is important that when the AQS is introduced into Australia that it is fully harmonized with international practices, particularly in relation to the

treatment of desiccating goods. Many of ACCORD's Members have an interest in this as producers and importers of soap products.

ACCORD's members have for a long time supported the introduction of the AQS. We note that in the Queensland discussion paper that the Australian proposal was not consistent with New Zealand's trade measurement system, nor was it harmonized with international practices for the treatment of desiccating products. ACCORD therefore recommended that before the system is introduced, the Trade Measurement Advisory Committee (TMAC) in consultation with industry should develop a system to ensure that the treatment of soap under the AQS is comparable to the current treatment regarding acceptable levels regarding moisture loss from bar soaps.

Cosmetic ingredient labeling

In November 2005, the Australian Government announced reforms to cosmetic regulation. The new framework for the regulation of cosmetics in Australia will provide for a more harmonised cosmetics regulatory framework in line with that of our major trading partners i.e. the European Union (EU) and the United States of America (USA). As Australia is a net importer of cosmetic products it is important that these changes be implemented as quickly as possible in order to reduce regulatory burden and associated compliance costs faced by industry due to the imposition of unique Australian requirements. The new legislative requirements are expected to be implemented during 2007.

The Cosmetic Regulations requires ingredient labelling of cosmetic products. The primary objective the Cosmetic Regulations was to enhance consumer safety by enabling consumers to identify ingredients to which they may be allergic and to assist consumers to compare various products. The Cosmetic Regulations have operated very well but will require modification as a result of the Government's cosmetic reforms. We believe that this provides an excellent opportunity to reform the Cosmetic Regulations to better reflect current international practices and standards by adopting a more harmonised approach.

ACCORD has made a number of recommendations to the ACCC such as:

- the acceptable use of commonly used Latin/French names or words used for cosmetic ingredients;
- allowing additional ingredient listing - allowing additional labelling would facilitate the importation of products which are used as cosmetics in Australia but regulated as over the counter medicines in the United States of America. US based multinational companies exporting products to Australia are required to over-label the active ingredients which are listed for the US market but as they are cosmetic products in Australia these active ingredients lists are not able to be included.
- Extending the Exempt cosmetic product provisions to include fully imported products intended for use as cosmetics which meet the labeling requirements of the European Union, the United States of America, Canada and/or New Zealand.
- Reducing regulatory overlap by limiting the scope of cosmetic regulations covered by other legislation, for example industrial hand cleaners for specific use in workplaces are not consumer products and will need to meet the labelling requirements under Australian governments' hazardous chemicals framework. Within the workplace, safety information regarding chemical use is disseminated through Safety Data Sheets. The Safety Data Sheet (SDS) is a document that describes the chemical and physical properties of a material and provides advice on safe handling and use of the material. These products

should not be required to comply with additional regulation such as the Cosmetic Regulations.

Harmonisation with New Zealand

ACCORD supports increased harmonisation with New Zealand to reduce regulatory barriers to the free trade of goods and services. To this end, ACCORD supports the principles of Closer Economic Relations with New Zealand and the full and proper implementation of the Trans Tasman Mutual Recognition Agreement. We believe that currently these initiatives have failed to deliver the intended economic benefits. This is not because the principles are flawed, but failure on the part of government bureaucracies and in particular, regulatory agencies to take their part in implementing properly the policy intent for reduced barriers to trade and a free exchange of goods and services across the Tasman. ACCORD notes that the ACCC and the NZ Commerce Commission have had an effective engagement for a considerable period and that there are limited differences in the nature of the consumer policy framework.

Given that New Zealand's recently introduced reforms to the regulation of cosmetic products has now harmonised their regulatory treatment with that of its major trading partners such as Australia, the EU and USA, ACCORD would recommend that cosmetic products no longer be a part of the special exemption for industrial chemicals under the TTMRA. Currently, industrial chemicals are excluded from the TTMRA and are part of the 5 year Cooperation program to achieve harmonisation. The regulation of cosmetic products falls under industrial chemicals as in Australia as in New Zealand they are regulated by the industrial chemicals regulator. We believe that cosmetics as a class of products are clearly defined and that these should be removed from the current exemptions. This would greatly enhance the free exchange of this class of products across the Tasman. We would recommend that the Australian Government take this under consideration.

Reduce duplication and inconsistency

ACCORD Members wish to bring to the attention of the PC the varying jurisdictional regulations regarding the treatment of competitions run by companies in the promotion of their products. The varying rules makes cross border competitions difficult to manage and incur unnecessary costs. While seemingly a trivial request, the uniformity of these requirements could bring great benefits to consumers and industry alike.

Recommendations

In conclusion, ACCORD makes a number of recommendations which if adopted, would significantly reduce the regulatory burden on our Members. We do not believe that the adoption of these recommendations would have a detriment effect on consumer sovereignty in Australia.

1. ACCORD recommends that a single national consumer protection law as within the framework of the Commonwealth's *Trade Practice Act 1974* be administered by a single national regulator in the area of not only consumer product safety but also consumer protection and enforcement which would be administered by the Australian Competition and Consumer Commission (ACCC).
2. ACCORD recommends the introduction of increased flexibility in Australia's national trade measurement system such as the acceptance of alternative compliance measures or deemed to comply provisions recognized the labeling of fully imported, pre-packaged consumer goods.

3. ACCORD recommends that the Trade Measurement Advisory Committee (TMAC) in consultation with industry develop a system to ensure that the treatment of soap under the AQS is comparable to the current treatment regarding acceptable levels of moisture loss from bar soaps.
4. ACCORD recommends a number of changes to the Trade Practices (Consumer Products Information Standards) (Cosmetics) Regulations 1991 (Cosmetic Regulations) as outlined above in this submission.
5. ACCORD recommends that cosmetic products no longer be a part of the special exemption for industrial chemicals under the Trans Tasman Mutual Recognition Arrangements (TTMRA).
6. ACCORD recommends that the rules regarding competitions run by companies be streamlined and harmonized.

Once again, I thank you for allowing ACCORD to provide comments on this important issue. Should you have any queries in relation to ACCORD's views on this matter, please do not hesitate to contact me on 02 9281 2322.

Yours sincerely

Approved for electronic transmission

Dusanka Sabic
Regulatory Reform Strategist

25 May 2007



Advocate for the Consumer, Cosmetic,
Hygiene and Specialty Products Industry

ACCORD Australasia Membership

Consumer, Cosmetic and Personal Care:

Alberto Culver Australia	Kao (Australia) Marketing Pty Ltd
Amway of Australia Pty Ltd	Keune Australia
Apisant Pty Ltd	Kimberly Clark Australia
Aroma Science	La Biosthetique Australia
AVON Products Pty Limited	La Prairie Group
Baylor Limited	L'Oreal Australia Pty Ltd
Beiersdorf Australia Ltd	LVMH Perfumes and Cosmetics
Chanel Australia	Nutrimetics Australia
Clorox Australia Pty Ltd	Procter & Gamble Australia Pty Ltd
Colgate-Palmolive Pty Ltd	PZ Cussons Pty Ltd
Combe Incorporated (Australia)	Reckitt Benckiser
Cosmax Prestige Brands Australia Pty Ltd	Revlon Australia
Cosmopolitan Cosmetics Pty Ltd	Scental Pacific Pty Ltd
Coty Australia Pty Limited	Shiseido (Australia) Pty Ltd
Creative Brands Pty Ltd	Skin Doctors Cosmeceuticals
Dermalogica Pty Ltd	Steric Pty Ltd
Elizabeth Arden Australia	Thalgo Australia
Emeis Cosmetics Pty Ltd	The Heat Group Pty Ltd
Estée Lauder Australia	Tigi Australia Pty Ltd
Frostbland Pty Ltd	Trilogy Products
GlaxoSmithKline Consumer Healthcare	Trimex Pty Ltd
Helios Health & Beauty Pty Ltd	Unilever Australasia
Innox Pty Ltd	YSL Beaute
Johnson & Johnson Pacific	

Hygiene and Specialty Products

Albright & Wilson (Aust) Ltd	Huntsman Corporation Australia Pty Ltd
Applied Australia Pty Ltd	Jalco Group Pty Limited
Callington Haven Pty Ltd	Lab 6 Pty Ltd
Campbell Brothers Limited	Milestone Chemicals Pty Ltd
Castle Chemicals Pty Ltd	Novozymes Australia Pty Ltd
Castrol Australia Pty Ltd	Nowra Chemical Manufacturers Pty Ltd
Chemetall (Australasia) Pty Ltd	Peerless JAL
Chemform	Recochem Inc
Ciba Specialty Chemicals	Rohm and Haas Australia Pty Ltd
Clariant (Australia) Pty Ltd	Solvay Interox Pty Ltd
Cleveland Chemical Co Pty Ltd	Sonitron Australasia Pty Ltd
Deb Australia Pty Ltd	Sopura Australia Pty Ltd
Dominant (Australia) Pty Ltd	Tasman Chemicals Pty Ltd
Ecolab Pty Limited	Thor Specialties Pty Limited
E Sime & Company Australia Pty Ltd	True Blue Chemicals Pty Ltd
Henkel Australia Pty Limited	Whiteley Corporation Pty Ltd

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