ACCORD

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

Regulation Reforms Study
Productivity Commission
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Dear Madam/Sir

Accord Australasia is pleased to provide the following submission in response to the Productivity Commission's (PC) Issues Paper: *Annual Review of Regulatory Burdens on Business: Identifying and Evaluating Regulation Reforms*.

Accord Australasia is the peak national industry association representing the manufacturers and marketers of formulated hygiene, cosmetic 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.

The formulated hygiene, cosmetic and specialty products industry is a significant industry sector contributing to a prosperous Australian economy. Our industry's products include household and commercial cleaning agents; disinfectants; make-up and beauty products; toiletries and personal care products; hair-care products; skincare products, including sunscreens; oral hygiene; fragrances and perfumes, feminine hygiene products; industrial and agricultural sanitisers; household pest control; and adhesives and sealants.

Sector products play a vital role in:

- *Safeguarding public health*: Maintaining essential standards of hygiene and sanitation in institutions, hospitality, manufacturing and agriculture.
- *Promoting personal well-being*: Helping people keep clean, healthy and shielded from harmful effects of the environment.
- *Maintaining comfortable homes*: Enabling people to keep their everyday surroundings clean and inviting.
- *Enhancing quality of life*: Giving people greater personal freedom through time- and effort-saving technologies.
- *Boosting confidence and emotional wellbeing*: Providing opportunities for self-expression, individuality and pampering.
- *Keeping the wheels of commerce and industry turning*: Fulfilling specialised uses in industry, institutions and agriculture.

Accord has around 94 member companies which range from smaller Australian-owned family businesses to the local operations of large consumer brand multinationals (a full membership list is provided at Attachment 1).

Headline features and statistics for our industry's economic footprint include:

- Estimated annual retail-level sales of industry products nudging the $10 billion mark.
- Accord member companies directly contribute more than 14,000 full-time equivalent jobs.
- Nationally more than 170 offices and more than 50 manufacturing sites are operated by Accord member companies.

Our sector is highly regulated with a recent internal Accord survey of members showing that:

- 97 percent have dealings with the National Industrial Chemicals Notification & Assessment
- Scheme (NICNAS)
- 77 percent with the Therapeutic Goods Administration (TGA)
- 58 percent with the Australian Quarantine Inspection Service (AQIS)
- 39 percent with the Australian Pesticides & Veterinary Medicines Authority (APVMA); and
- 33 percent with Food Safety Australia New Zealand (FSANZ).

In essence there are three distinct product segments for our industry, each with distinct supply chains through to the product end user:

- Industrial and Institutional products (e.g. commercial cleaning products, agricultural sanitisers) which are mainly sold on a business-to-business or business-to-government basis or through agricultural product resellers.
- Fast-moving consumer goods (e.g. household cleaners, laundry detergents, toothpaste, shampoo, soap) which are sold to consumers primarily via either: grocery retailers, pharmacies, mass-market retailers, direct selling and hardware chains.
- Cosmetic and beauty industry products (e.g. make-up, skincare, sunscreens, fragrances, hair dyes) which are sold to consumers primarily via either: department stores, specialty retailers, grocery retailers, pharmacies, mass-market retailers, direct selling, hair salons, beauty salons, spas and on-line.

In our submission we will provide some general comments regarding regulatory reform efforts to our sector and then provide some information to specific issues raised in the Issues Paper.

General comments

In general it would be fair to say that Accord is extremely frustrated and disappointed with the lack of progress on the reform initiatives for our sector.

The chemicals and plastics industry has been under constant review since 1996 commencing with the Bell Review. The report of the Small Business Deregulation Task Force recommended that the Commonwealth Government send a reference to the Productivity Commission (PC) to inquire into and report by 31 December 1997 on the most efficient and effective institutional and regulatory arrangements for industrial, agricultural and veterinary chemicals. The Government established a Chemicals and Plastics Action Agenda and, in 2002 in response to the Report of the Chemicals and Plastics Leadership Group, committed itself to amongst other things reducing unnecessary regulation. As a result of the Banks Review in 2006, the chemicals and plastics industry become one of COAG's top ten national 'hot spots' in the National Reform Agenda, a Ministerial Task Force on Chemicals and Plastics Regulation was formed and in 2007 the PC was asked to undertake the research study into chemicals an plastics regulation.

With all this attention on the chemicals and plastics sector, one could assume that the industry would have seen some outcomes and that it would be reasonably satisfied that COAG was tangibly addressing industry concerns. Instead, the scrutiny to which our sector has been subjected would seem to have only increased the cumulative burden of regulation, added costs to business operations, made trade more difficult and in general provided a disincentive to innovation. Efforts to develop measures to achieve a more streamlined and nationally harmonised control system for the management of chemicals and plastics regulation have, for the most part, failed dismally.

Our industry's single biggest problem remains Australia's costly, complex and fragmented regulatory system for the management of chemicals across jurisdictions.

Despite COAG and the Commonwealth Government setting reform for the chemicals and plastics industry as a priority – this has failed to deliver tangible outcomes. Therefore more than simple priority setting is required to achieve successful policy outcomes.

What frameworks and approaches have been used to identify areas for regulatory reform?

The PC is seeking feedback on examples of successful approaches to reform. A good example of a successful reform process was the Bell inquiry into red tape reduction. While it might not have achieved success in regard to specific recommendations for the chemicals and plastics sector, as an overall approach to developing and implementing a reform process, it was viewed as a success.

What made it successful was that the work of the Task Force was clearly a priority, having been a pre-election commitment by the then Opposition prior to forming government, well-defined terms of reference, goals and objectives and political support at the highest level to not only the inquiry process, but also to the implementation phase. The establishment of a cross portfolio Task Force secretariat, staffed by high ranking officials from key agencies provided not only sector specific expertise, but also provided the buy-in to the reform process by these agencies also at the highest levels. The involvement of departmental secretaries and their Ministers was not unusual during the development of the recommendations. Ministers were engaged in the reform process and took responsibility for outcomes. Recommendations were developed with relevant government agencies and hence were deliverable. Accountability for progress was through cabinet reporting. The Prime Minster was committed to the process and appointed a strong champion in Cabinet to oversee the finalisation of the implementation process.

The key to successful reform is strong political leadership and a champion for reform.

In contrast, the PC's Research Report on Chemicals and Plastics Regulation (July 2008), while having the full support of the industry, did not appear to have the same level of strong political support at the highest levels. There was little commitment to implementation and it was allowed to languish for a considerable period before the Standing Committee on Chemicals (SCOC) was established to oversight implementation of the report's recommendations.

The PC's Research Report made 30 recommendations for reform including a new governance framework to achieve better coordination of chemicals and plastics regulation. In November 2008, COAG provided an interim response to the PC's recommendations welcoming the Commonwealth's approach to the recommendations and agreed to the new governance framework to oversee the reform process. This resulted in the establishment of a COAG Memorandum of Understanding for Chemicals and Plastics Regulatory Reform and the establishment of a Standing Committee on Chemicals (SCOC), but not until some 12 months later. The SCOC has recently taken to publishing progress reports on implementation of the PC's 30 recommendations. As at May 2011 only 3 reforms had been completed and industry is disputing the effectiveness of the implementation of one of these.

The show of good faith to the reform process initiated by the Government through the introduction of the *early harvest* reforms has also only served to distract from the proper implementation of the full suite of PC recommendations for the chemicals and plastics sector. And not many of the so-called *early harvest* reforms have been delivered, e.g. the reform to disinfectants which Banks put forward in 2006 is still to be developed. It is our understanding that the *early harvest* reform initiatives were put forward by the regulatory agencies themselves and therefore should have been relatively simple and straightforward to implement.

The result has been a mixed bag with some delivery of *early harvest* initiatives but these have not led to any real outcomes.

We would add that, regulatory agencies are probably the most poorly placed to understand what industry requires of reform and to deliver reform in the most cost effective and timely manner.

For example, NICNAS put forward an evaluation of one of its reform programmes – the initially successful Low Regulatory Concern Chemicals (LRCC) reform process which had been developed and delivered under the aegis of the Chemicals and Plastics leadership Group. The *early harvest* reform initiative was to undertake an evaluation of the LRCC process. This has now been recorded as completed by NICNAS. The independent consultants' report was completed in November 2009. The report cost some $220K in direct and indirect costs, paid for by industry cost recovered monies. It is now August 2011 and the 11 options for improving the LRCC process have not been implemented as outlined in Case Study 1 below.

One of the main concerns which industry has with the LRCC reform initiatives was the introduction of the requirement for annual reporting of even minute amounts of new chemicals. Industry has argued that this is a significant burden and that it should be removed. The consultants' report came to the same conclusion and recommended action. Australia is the only OECD economy with a new chemicals programme which requires annual reporting for small amounts of exempt low-risk ingredients.

Case Study 1 Reforms need outcomes – they are not an end in themselves

In 2009 industry was provided with a copy of the government's progress report to the Business Regulation and Competition Working Group (BWRG) with implementation on the early harvest and PC recommendations. A reporting system using the traffic light system was used with red indicating no progress and green as complete. Industry felt compelled to provide a response to the government's self assessment of its own progress. One example to illustrate the case as outlined above is provided below**.**

Reform 14*. National Industrial Chemicals Notification and Assessment Scheme to evaluate the effectiveness of the low regulatory concern chemical (LRCC) reforms introduced in 2004.*

Recommendation 14: *COAG agrees to the National Industrial Chemicals Notification and Assessment Scheme (NICNAS) evaluating the effectiveness of the low regulatory concern chemical reforms introduced in 2004,*

Milestone (agreed by COAG July 2009*)*:*
NICNAS to evaluate the industry impact by December 2009 and that NICNAS report progress to COAG's Business Regulation and Competition Working Group in December 2009.

Lead agency: NICNAS

Progress

Given the green light - self reported as Completed.

The first phase of the LRCC evaluation (impact on industry) is complete. This phase included obtaining and analysing stakeholder comments.

The second phase of the evaluation, which is outside this early harvest proposal, will be planned and progressed in 2010. This is intended to concentrate on the impact of the reforms on the community and other stakeholders, such as other government agencies.

Industry comments
This process is not on track and should be changed to red. The evaluation may have been completed, but there has been no action by NICNAS to implement the Independent Consultant's options to improve the operations of the LRCC.

The Independent Consultants provided a draft report in June 2009. However the options for reform have not been considered by NICNAS and industry is unaware if the 11 options are acceptable or not. NICNAS has indicated that it wishes to undertake further consultation with the community and that the LRCC evaluation process will not be completed until 2012/13.

Accord provided these comments to the Chair of the SCOC Secretariat in November 2009. Nothing has changed since that time.

The PC research report provided a road map for improving the efficiency and effectiveness of the chemicals and plastics industry. The road map was developed through extensive consultation and was a negotiated outcome which included all stakeholders: government, the community and industry. It is disappointing that much resistance to implementation of the PC recommendations appears to be coming from some key departments and agencies. ACCORD has written on numerous occasions to various government agencies seeking their support to implement the PC recommendations as a suite of reforms. In particular the Department of Health and Ageing's (DoHA) lack of progress is extremely disappointing as it has a pivotal role in ensuring the success of the reform process with the implementation of Rec 4.3 which changes the nature of NICNAS and introduces new structural arrangements for the risk assessment and risk management of industrial chemicals in Australia.

We suggest that the PC needs to look no further than at its own study and COAG's inability to implement the recommendations as an excellent case study in the failure of the reform process to deliver meaningful outcomes.

While the agencies initially appeared to be engaged during the review process, they now appear to have become disengaged during the implementation process. This may be for a number of reasons such as: lack of resources; the PC review is no longer regarded as a priority due to lack of high level political support; agencies themselves may be unable to deliver reform either because of an innate inability to understand reform or an inbuilt resistance to change. The PC identified that Australia's regulatory agencies are very risk averse and industry has always argued that cultural change is required if reform is to succeed. The PC understood the inherent dangers in undertaking reform and identified these in its report. While it provided a report and recommendations which would mitigate against failure by developing a comprehensive suite of reforms, there has been significant resistance to implementing these recommendations.

Failure to deliver meaningful outcomes means that there are no benefits flowing to the Australian economy – just a cumulative net burden accruing from poor regulation and the poor administration of regulation by regulatory agencies.

Reforms should not lead to unintended consequences resulting in regulatory creep. Unfortunately, this has been our experience with the reforms over the years. As outlined in Case Study 1, the key issue identified by industry in the review of the LRCC reform process was the need to remove the annual reporting burden. This was an unintended consequence of the reform process. Now that it has been identified as an issue both by industry and through an independent evaluation and NICNAS has 5 years of data to analyse and demonstrate that these minute amounts of reported chemicals do not pose an undue risk, we believe that action should be taken. As the Australian Chamber of Commerce and Industry (ACCI) pointed out in its submission, what may have begun as an innovative reform and good regulation, over time has led to an excessive burden on industry. This is the case with the burden of annual reporting, a red-tape requirement for which the regulator has been unable to demonstrate any tangible improvements in terms of health and safety outcomes, i.e. the benefits do not outweigh the costs.

However, in other instances reform has intentionally led to an increased burden or regulatory creep; e.g. in the reform to products at the cosmetic and therapeutic interface. The PC had commented on the failure of regulatory agencies to deliver reforms for such low risk products.

Case study 2 – Reform should not result in regulatory creep

The implementation of the seemingly sensible reforms for products at the cosmetic/therapeutic interface has significantly **increased the regulatory burden** for many companies through the requirement of annual reporting of minute amounts of chemical ingredients in finished cosmetic products. These requirements are unique to Australia (and not required by the TGA). Added to this is the **additional SPF testing** to the Australian Standard specifically for secondary sunscreen products not previously required under the TGA. The TGA had accepted equivalence to EU or US FDA standards – but equivalence is not acceptable to NICNAS.

When raising this issue in correspondence with the Director NICNAS, she advised that *The decision to specify testing in accordance with AS/NZ 2604:1998 was to maintain health and safety standards and consistency between all cosmetic products containing SPF, that is all moisturisers with secondary sunscreens, sunbathing products, foundations and lip products.*

This decision was taken in the absence of any impact assessment or justification as to why additional regulatory controls were required for these products above those which had been required by the TGA. For one Accord member company this new requirement to test only to the Australian Standard cost an estimated $180K to retest products already in the Australian market in order to meet the new Cosmetic Standard. NICNAS should be required to undertake a post market impact assessment for this decision.

Despite the establishment of SCOC and its comprehensive terms of reference, Accord has seen little by way of tangible benefit from its work regarding implementation of the PC recommendations or improvements in the regulatory framework for chemicals and plastics. If anything, Accord members would argue that it is quite the reverse, and that there is an increase in the cumulative regulatory burden rather than decrease or simplification of the existing framework. A far cry from the seamless national economy which has been the driving force behind COAG's so called "*hot spot*" reform agenda.

Utilising international agreements to facilitate reform

The PC is seeking views as to whether international agreements or other commitments can be used more effectively to progress regulation reform in Australia?

Accord believes there is scope for this and to this end has itself embarked on a trade-related project to map how unique Australian requirements are acting as a barrier to trade and the transfer of new technologies into Australia. Much of Australia's regulation of chemical and plastics is unaligned with that of our major trading partners and these, in essence constitute a 'behind the border' barrier to trade.

It is of interest that such barriers have become a focus of the Australian Government's agenda for APEC with Trade Minister Emerson calling on APEC economies to focus on domestic reforms as a priority for achieving improved regional trade facilitation (Minister Emerson's Press Statement 22 May 2011)

It is therefore disappointing that this recognition of the importance of breaking down behind-the-border regulatory barriers has not been met by tangible reform outcomes in Australia.

In contrast, when comparing international regulatory approaches, we only have to look at the benefits New Zealand industry is gaining from having a pragmatic regulator which is committed to

reducing the regulatory burden on industry. One initiative is to accept deemed-to-comply provisions for trade impacting regulatory decisions such as labelling and packaging made by comparable regulatory authorities such as Australia, USA and Canada. This means that for many products imported into New Zealand, labels are not required to be changed to meet particular New Zealand requirements. And, conversely, New Zealand exporters can have one label which meets the requirements of many markets. The World Bank Group ranking of economies on the basis the ease of doing business ranks New Zealand ranked as the Number 1 OECD economy. In the area of chemicals management, New Zealand has applied a risk management framework which encourages business via a system of minimum effective regulation.

In contrast, there is no such acceptance of regulatory equivalence by Australian regulators of products meeting the extensive requirements of the EU, USA or Canada. The risk management framework adopted by Australian regulators appears to consistently adopt and reimpose the most stringent requirements. For example, in the area of industrial chemicals, Australia participates in the OECD new chemicals fora and even chairs the New Chemicals Clearing House, yet our regulations diverge and go beyond agreed OECD criteria for the treatment of low-risk chemicals and polymers.

Australian regulatory agencies also appear to escape the level of parliamentary and departmental financial and performance scrutiny that is applied to budget-funded agencies. Industry believes that this is due in part to the fact that Australian regulatory agencies are fully cost-recovered. The perception is, these regulatory agencies are allowed to operate outside the Government's policy framework, particularly in the area of chemical safety policy. The industrial chemicals regulator, NICNAS, appears to have taken on the role of not only the administration of its legislation, but also for the policy development of chemical safety matters with minimal oversight by its portfolio department, the Department of Health & Ageing.

We believe that the Government's own cost-recovery guidelines require reconsideration with input to the policy review process from the affected parties i.e. industry. Australian industry has always supported cost-recovery measures but only if they are efficient and effective and assist with building Australian industry's competitive advantage. We see little evidence of this in Australia. If the PC did a comparison of the regulatory costs for chemicals and plastics as incurred by industry across comparable economies, it would find that Australian industry absorbs a significant cost which acts a deterrent to the introduction of novel ingredients and technologies into Australia.

The Discussion Paper identifies a number of conditions which can drive reform. Accord strongly supports the principle that international trade considerations be a strong pre-condition in setting reform priorities. Australia's legal framework for the management of chemicals and plastics derives from the policy settings of the early 1980's prior to the liberalisation of trade settings which was a feature of the Hawke-Keating Government, e.g. *Industrial Chemicals (Notification and Assessment) Act 1989* and *Therapeutic Goods Act 1989*. Neither of these pieces of legislaiton take into account trade issues or obligations and have not been reviewed since Australia opened its markets and became part of the global market place.

Australia's regulatory agencies have adopted many unique Australian requirements under the guise of health and safety protection. These arguments simple do not carry weight any more as Australian consumers are freely able to purchase many products on-line and avail themselves to products otherwise not available in the Australian market place because of regulatory barriers.

A case in point is sunscreens with an SPF value higher than 30+.

Case Study 3 – maintenance of unique Australian requirements

In Australia, the regulation of primary sunscreen products is undertaken by the Therapeutic Goods Administration (TGA). Primary sunscreens and secondary sunscreens with a therapeutic effect are regulated as medicines. This high level of regulatory intervention is unique to Australia. For example, classification as a medicine requires Good Manufacturing Practice (GMP) to an ingestible medicines standard when sunscreens are for topical application to intact skin. It also requires testing of excipients to a standard for ingested products, not topical applications, as well as pharmacovigilance responsibilities to a medicines standard. This level of regulatory intervention is not commensurate with the level of risk for comparable products.

Internationally, these products are regulated as either cosmetics or over-the-counter products – but not as medicines. We believe that a medicine standard is too high for these products and submit that primary sunscreens can be subjected to a lighter regulatory touch without any diminution of public health and safety.

The regulation of sunscreens in Australia is a good example of the complexity and fragmentation of the regulatory controls for these products which are generally well characterised, low-risk, fast moving consumer goods. The options for change must be considered within the context of the global market and opportunities for export trade as well as taking into account the current barriers to trade.

The internet has expanded consumer opportunities to shop globally. This has provided consumers with the opportunity to avail themselves to the latest products and innovations which local markets may not provide either because:
- regulatory barriers inhibit trade and their introduction
- they are simply yet to reach these markets; or,
- they may never reach these markets as the market's size is simply not large enough to sustain viable commercial operations.

There are a number of reasons why global companies may choose not to supply product into a particular market – but an overriding consideration is the cost of doing business and the cost of product introduction. Australian consumers currently have internet purchase access to higher preforming sunscreens with SPF of 100+. These products are available for online purchase and are entering the country despite Australia's antiquated legislation to treat them as medicines and keep them to a maximum SPF of SPF 30+. The expansion of online purchasing creates inequality of market access and compliant companies are paying the price through loss of sales and regulatory costs.

Reform to the regulation of sunscreens while still remaining therapeutic goods is essential to deliver better and more responsive regulation resulting in access to cheaper products to the Australian consumer such as those available to New Zealand consumers.

Examples of unique Australian requirements which add unnecessary costs are:

- GMP requirements to a medical level equivalent to oral not topical medicine standard

- TGA medicines stand GMP requirements – again for GMP stand for oral not topical medicine

- Testing of excipient ingredients to an oral medicines standard.

- Adoption of unique Australian nomenclature in preference to adopt of internationally recognised nomenclature

- Labelling inflexibility to a medicines stand which deprives consumers of additional information available to consumers elsewhere

- A change of pack size from a 300mL bottle to 350mL bottle now makes a cosmetic product a therapeutic good and is therefore regulated as a medicine

Industry has participated in good faith in a considerable number of reform initiatives undertaken by various Governments. These include the Banks Review, the PC study of chemicals and plastics regulation as well as a range of reviews undertaken by the key regulatory agencies with which our Accord member companies deal with on a daily basis.

We continue to remain extremely frustrated at the lack of progress on significant reform initiatives for our sector, many of which have been agreed by the COAG, but have not been implemented because of a lack of responsiveness by regulatory agencies to the concerns of industry.

Yours sincerely

Authorised for electronic submission

Bronwyn Capanna
Executive Director

5 August 2010

Members

Consumer, Cosmetic and Personal Care

Advanced Skin Technology Pty Ltd
Amway of Australia Pty Ltd
Apisant Pty Ltd
AVON Products Pty Limited
Beautiworx Australia Pty Ltd
Beiersdorf Australia Ltd
BrandPoint Pty Ltd
Chanel Australia
Clorox Australia Pty Ltd
Colgate-Palmolive Pty Ltd
Combe Asia-Pacific Pty Ltd
Cosmax Prestige Brands Australia Pty Ltd
Coty Australia Pty Limited
De Lorenzo Hair & Cosmetic Research Pty Ltd
Elizabeth Arden Australia
Emeis Cosmetics Pty Ltd
Energizer Australia Pty Ltd
Estée Lauder Australia
Frostbland Pty Ltd
GlaxoSmithKline Consumer Healthcare
Helios Health & Beauty Pty Ltd
Johnson & Johnson Pacific
Kao (Australia) Marketing Pty Ltd
Kao Brands Australia Pty Ltd
Keune Australia
Kimberly-Clark Australia
KPSS Australia Pty Ltd
La Biosthetique Australia
La Prairie Group
L'Oréal Australia Pty Ltd
LVMH Perfumes and Cosmetics
Mary Kay Cosmetics Pty Ltd
Natural Australian Kulture Pty Ltd
Nutrimetics Australia
NYX Pty Ltd
Procter & Gamble Australia Pty Ltd
PZ Cussons Australia Pty Ltd
Reckitt Benckiser
Revlon Australia
Sabre Corporation Pty Ltd
Scental Pacific Pty Ltd
Shiseido (Australia) Pty Ltd
The Heat Group Pty Ltd
The Purist Company Pty Ltd
Three Six Five Pty Ltd
Trimex Pty Ltd
True Solutions International Pty Limited
Ultraceuticals
Unilever Australasia
Valeant Pharmaceuticals Australasia
Weleda Australia Pty Ltd

Hygiene and Specialty Products

Albright & Wilson (Aust) Ltd
Applied Australia Pty Ltd
BP Castrol Australia Pty Ltd
Callington Haven Pty Ltd
Campbell Brothers Limited
Castle Chemicals Pty Ltd
Chemetall (Australasia) Pty Ltd
Clariant (Australia) Pty Ltd
Cleveland Cleaning Supplies Pty Ltd
Deb Australia Pty Ltd
Dominant (Australia) Pty Ltd
Ecolab Pty Limited
Huntsman Corporation Australia Pty Ltd
Jalco Group Pty Limited
Lab 6 Pty Ltd
Novozymes Australia Pty Ltd
Nowra Chemical Manufacturers Pty Ltd
Peerless JAL Pty Ltd
Recochem Inc
Rohm and Haas Australia Pty Ltd
Solvay Interox Pty Ltd
Sopura Australia Pty Ltd
Tasman Chemicals Pty Ltd
Thor Specialties Pty Limited
True Blue Chemicals Pty Ltd
Univar Australia Pty Ltd
Whiteley Corporation Pty Ltd

Associate Members

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Megara (Aust.) Pty Ltd

SCHÜTZ DSL (Australia) Pty Ltd

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Ident Pty Ltd

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August 2011