

Aerosol Update



24 September 2009

Overview

- GHS implementation
- Workplace labelling (SWA)
- Weights and measures
- Labelling claims – be careful!
- ADG7
- Spray paints (Graffiti)
- New Zealand HSNO – a reminder
- Disinfectants
- *Diary Dates!*

GHS

- Still debate over how it is adopted
- Scope
- Workplace/consumer/AgVet products
- Proposal – used for SUSDP criteria (but not labelling)?

www.health.gov.au/internet/main/publishing.nsf/Content/ghs-discussion-paper.htm

- Likely timeframes



Workplace Labelling

- Safework Australia Proposals

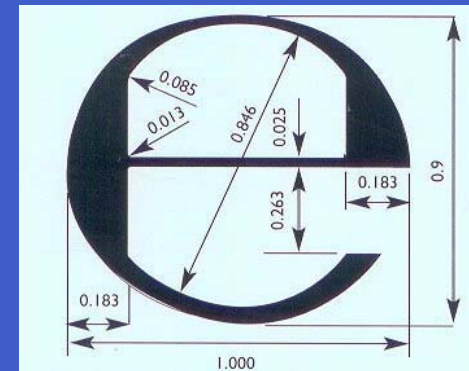
www.safeworkaustralia.gov.au/swa/HealthSafety/HazardousSubstances/Proposed+Revisions.htm

[Comment closes tomorrow]

- ALL dangerous goods - i.e. ALL aerosols - will become 'hazardous workplace chemicals'
- Likely timeframes

Weights & Measures

- Is going national from 1/7/2010
- New regulations gazetted in September - see www.measurement.gov.au
- ‘Dual marking’ and imperial accepted but MUST have weight in grams on front
- Average Quantity System and the ‘e’ mark
- Note: FEA STD 422: “Filled aerosol packs – Standard fill levels”



Labelling claims

- ‘Greenwash’ – make sure you qualify/substantiate any environmental claims

<http://tinyurl.com/green-claims>

- Be wary of claims like “Product of Australia”

<http://tinyurl.com/COO-claims>

>EXAMPLES OF ‘GREEN’ MARKETING CLAIMS

PINE O CLEAN GLEN 20 SPRAY DISINFECTANT
CLAIM: The packaging says it is “CFC free”.
COUNTERCLAIM: The ACCC guidelines say claiming a product is CFC free is “meaningless” because CFCs have been banned in almost all aerosols.

SAAB
CLAIM: Advertisements last year claimed that “Saab is green” and promised that for every sale, 17 native trees would be planted to offset carbon dioxide emissions for the life of the vehicle.
COUNTERCLAIM: The ACCC is taking legal action against GM Holden, supplier of Saabs in Australia, saying that the ads were misleading and breached the Trade Practices Act as the tree planting would only offset carbon emissions for a year.

WONDERSOFT TOILET TISSUE
CLAIM: The packaging has a symbol with the words “renew, reuse, reduce, rethink.”
COUNTERCLAIM: The toilet rolls are not made from recycled paper. The ACCC guidelines state that “using a symbol that is widely accepted as having a particular meaning or affiliation... can be misleading”.



THE Daily Telegraph

Natural, Organic Instinct products contain chemicals, ACCC says

- Font size: Decrease / # Increase / #
- Email article: Email (dailytelegraph@news.com.au)
- Print article: Print ([javascript:print\(\)](#))
- Submit comment: Submit comment ([#submit-feedback](#))

Web site: (<http://www.news.com.au/dailytelegraph/>) Daily Telegraph

April 17, 2009 12:00pm

HAIR and skin product manufacturer Natural Products of Australia will replace its “organic” and “natural” labels after court action by the Australian Competition and Consumer Commission (ACCC).

The manufacturer has agreed to relabel its Natural Instinct and Organic Instinct hair and skin care products after the ACCC alleged chemicals were contained in the Natural Instinct product.

Natural Instinct’s management has undertaken to relabel its products, provide full refunds to affected customers and place corrective notices in Sunday newspapers and women’s magazines throughout the nation, an ACCC statement said.

ACCC Deputy Chairman Peter Kell said the ACCC was concerned that inaccuracies in Natural Instinct’s labels would mislead consumers about the composition of its products.

“This is particularly important for consumers with allergies who need to avoid particular ingredients and chemicals,” he said.

“There is also a trend toward buying natural, organic and environmentally friendly products.”

He said consumers should be able to rely on labels to provide accurate information about chemicals and other ingredients in cosmetic products.

The ACCC said Natural Instinct did not list chemicals such as sodium laureth sulphate.

It also said it was concerned about statements that its products are “made with/ from 100 per cent pure oils and organic herbs” because it contained relatively insignificant amounts of herbs and oils.

ACCC web resources

- Country of Origin

www.accc.gov.au/content/index.phtml/itemId/303666

- Green claims

www.accc.gov.au/content/index.phtml/itemId/815763

- Cosmetic labelling

www.accc.gov.au/content/index.phtml/itemId/323594

- Recalls

www.recalls.gov.au/content/item.phtml?itemId=952921&nodeId=1678d320f0cb8dbb24208a74940f9e35&fn=Product%20safety%20recall%E2%80%94a%20guide%20for%20suppliers.pdf

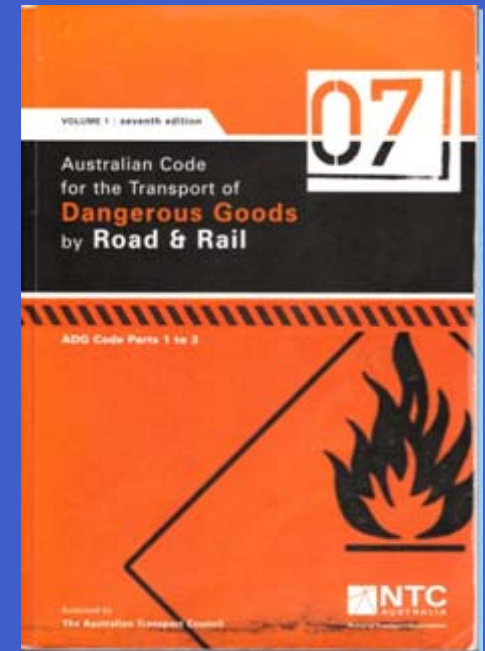


ADG7

- Fully in place by 1/1/2010
- New UN/GHS flammability criteria adopted (SP63)
- Has LQ chapter (3.4)
- Available free on-line

www.ntc.gov.au/ViewPage.aspx?DocumentId=01147

<http://tinyurl.com/aeroflamm>



ADG7 *(cont'd)*

- Totally delegates aerosol labeling to AS2278.

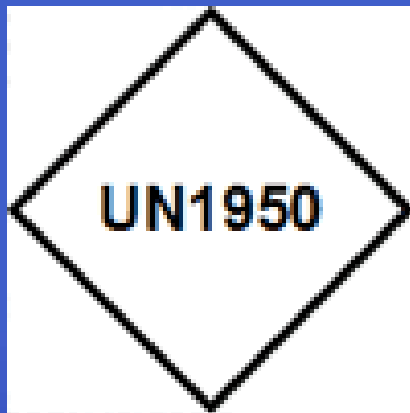
Table 5.1 (a) - “Aerosols should be marked in accordance with AS2278”

- Introduces provision for alternatives to the waterbath
- More detail re transport of ‘waste’ (reject) aerosols
- Recognises overseas standards

cl. 6.2.4.2 – “Aerosol dispensers must comply with AS 2278 or an equivalent international or foreign standard”

ADG7 *(cont'd)*

- Allows a new carton marking (below) for LQ loads (*but the UN has just agreed on a new one !!*)
- Makes explicit the ability to use shrink-wrapped trays
- The 'RDC' provision remains. See 'Chapter 7.3 — Retail Distribution Loads'



Spray Paint Issues

New South Wales

- Imminent launch of new strategy

Western Australia

- *Criminal Code Amendment (Graffiti) Bill 2009*



Tough new graffiti laws are now in place.
For more information visit justice.vic.gov.au/graffiti

A Victorian
Government
Initiative
Victoria

HSNO (New Zealand)

- Acceptance of ‘overseas’ labelling (to be extended beyond 2010?)
- Label needs “enough information to enable its New Zealand importer, supplier, or manufacturer to be contacted, either in person or by telephone”



HSNO (New Zealand)

Web resources:

- Aerosol 'Group Standards' at <http://tinyurl.com/HSNO-aerosol> .
- For advice on the 'status' of a substance see <http://tinyurl.com/ERMA-advice>
- For labelling advice see <http://tinyurl.com/ERMA-labeling>

Disinfectant Reforms

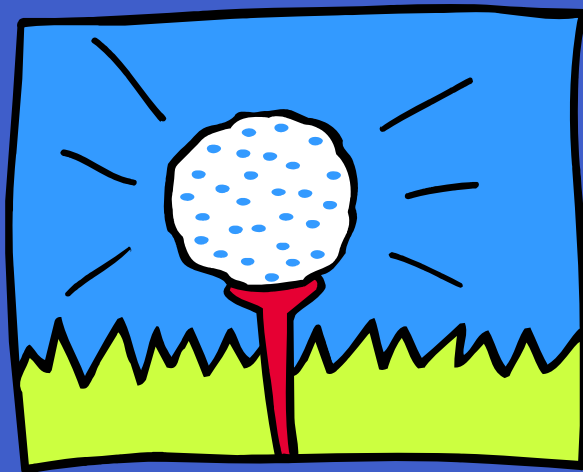
- Second round of consultations to begin in October
- Aim to have resolved the preferred approach by end of 2009

www.tga.gov.au/othertg/disinfectants/disinfreg.htm

www.nicnas.gov.au

Diary Dates

'AEROSOL CUP' GOLF DAY - 10
NOVEMBER 2008



WWW.AEROSOL.COM.AU