

To: Australian Govt Dept of Health  
Therapeutics Goods Administration  
Canberra  
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Date: 7<sup>th</sup> March 2019

From: Jeff Simpson  
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**Scheduling delegate's interim decisions & invitations for further comment: 7 Feb 2019**

**Jeff Simpson, Haztech Environmental submission on Naphthalene,**

at <https://www.tga.gov.au/book-page/22-naphthalene>

It is proposed:

Schedule 7 - New Entry

NAPHTHALENE (excluding its derivatives) except in liquid hydrocarbons as an impurity.

Schedule 10 - New Entry

NAPHTHALENE for domestic use except when enclosed in a device which, in normal use, prevents removal or ingestion of its contents.

Comment: These two entries completely overlook the extensive use of Aromatic Hydrocarbon solvents in domestic use products e.g. such as a Pesticide delivering solvent and in Home Workshop products (such as solvents), where Naphthalene is a standard ingredient in many Aromatic Hydrocarbon solvent containing products at 5-10%. Naphthalene cannot be considered an impurity in these solvents.

To manage these Aromatic Hydrocarbon solvent containing products, I would suggest the following.

Schedule 6 – Adjust the Existing Entry

NAPHTHALENE (excluding its derivatives) as a liquid product, with 10% or less Naphthalene

Schedule 7 - New Entry

NAPHTHALENE (excluding its derivatives) with >10% Naphthalene.

Schedule 10 - New Entry

NAPHTHALENE for domestic use, as a solid or paste product, except when enclosed in a device which, in normal use, prevents removal or ingestion of its contents.

For Info:

SCHEDULE 10: Substances of Such Danger to Health as to Warrant Prohibition of Sale, Supply and Use

**FINISH Comment**