

Dr John Skerrit  
Department of Health  
Sirius Building  
23 Furzer Street  
Canberra ACT 2606

Dear Dr Skerrit

**Consultation: Proposed amendments to the Poisons Standard - ACMS and Joint ACMS/ACCS meetings, June 2020 – isothiazolinones**

The Australian Paint Manufacturers' Federation welcomes the opportunity to comment on the proposed amendments to the Poisons Standard for isothiazolinones.

The APMF seeks to advance the economic, environmental and societal contribution of Australia's paints and coating industry. The industry produces some \$2.5 billion worth of paint and coating products per year and provides over 4,000 FTE jobs.

Virtually every man-made product or structure has a coating. Architectural paints and coatings are used to enhance the aesthetic of and to protect homes and other buildings. Specialty paints and coatings include the high-performance products that protect bridges, the electricity grid, telecommunication networks; and many other structures. Industrial coatings are typically factory-applied and include finishes on medical equipment, food service products like cans, jars and packaging, transportation equipment, paper, metal building products and much more.

Coatings provide additional and much needed performance characteristics to the finished product, providing protection from degradation like corrosion, abrasion, high or low temperatures, chemicals and ultraviolet rays, moisture, and microbes, among a host of aggressive or destructive conditions.

Isothiazolinones play an important role as a preservative and active biocide in paints and coatings, ensuring their longevity prior to application. They perform a similar function in many other products, including adhesives, cleaners, polishes, anti-mould sprays, inkjet printer inks, marker pens, cutting fluids, coolants, caulks and sealants. In the context of paints and coatings, the use of isothiazolinones has been critical in the shift from solvent-based paints to water-based alternatives, reducing VOC levels.

The APMF believes that the current poison scheduling requirements for isothiazolinones are adequate to address the risks associated with those substances. The APMF opposes the proposed amendments to the poison standard for isothiazolinones for the following reasons:

- Paints and coatings are not intended to be applied to the skin. Scheduling substances on the basis of incidental hazard is likely to set a precedent in relation to other substances and significantly expand the number of substances requiring scheduling;
- No evidence has been presented that demonstrates adverse experiences or outcomes associated with the relatively low concentration of isothiazolinones in paints and coatings that would justify the proposed regulatory action;

- Overuse of warning statements on products ultimately undermines the value and purpose of the poison scheduling system. Consumers become desensitised to warnings if they become too prevalent; and
- The data indicates that different isothiazolinones perform differently in terms of sensitisation risk. Yet, the proposal groups all isothiazolinones together. This discourages manufacturers from selecting raw materials that might offer better performance and outcomes.

If you require any additional information or would like to discuss this matter, please contact me at

[REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

Executive Officer