

Submitted to **Proposed warning statement regarding a fire hazard on the labels of paraffin-based skin products**

Consultation

1 Should a warning statement about a fire hazard be included on the package labels of paraffin-based skin products

Yes

Please add your comments:

Please see the letter from ASMI, sent to Mesdafa via email

2 Would you prefer Option 1 or Option 2 as a warning statement?

Option 2

Please add your comments:

Please see the letter from ASMI, sent to Mesdafa via email to [REDACTED] on Friday 7th December 2018.

3 Does Option 1 adequately address the fire hazard risk (ie, Caution: If this product comes into contact with dressings and clothing the fabric can be more easily ignited with a naked flame. You should keep away from fire when using this product)?

Yes

Please add your comments:

4 Does Option 2 adequately address the fire hazard risk (ie, Caution: This product may make dressings and clothing more easily ignited with a naked flame)?

Yes

Please provide your comments:

Please see the letter from ASMI, sent to Mesdafa via email to [REDACTED] on Friday 7th December 2018.

5 Should the warning statement only apply to products containing 50% or more of paraffin

Yes

Please provide your comments:

The consultation did not elaborate or provide any information on whether products that contain less than 50% paraffin carry a heightened risk of fire when used under the circumstances that carry risk.

Given the absence of data on comparative risks, ASMI supports the 50% cut-off for inclusion of a warning statement.

Please see the letter from ASMI, sent to Mesdafa via email to [REDACTED] on Friday 7th December 2018.

6 Should the warning statement only apply to packs intended for use in large quantities (eg. pack size of 50g or more)?

Yes

Please add your comments:

Please see the letter from ASMI, sent to Mesdafa via email to [REDACTED] on Friday 7th December 2018.

There is limited space on smaller pack sizes, and these pack sizes are not likely to be used in large quantities.

7 Do you have any other comments about a proposed warning statement regarding a fire hazard on the labels of paraffin-based skin products?

Please add your comments:

Labelling on its own is of limited effectiveness in educating about the associated hazards such as infrequent washing of bedding / clothing and cigarette smoking, so an education and awareness campaign should be conducted, targeting dermatologists, healthcare professionals, aged care and residential facilities and in-home carers.

Many emollient products used in large quantities are cosmetics (e.g. large tubs of emulsifying ointment) and in some cases devices (e.g. bandages impregnated with petroleum jelly). Medsafe should work with other NZ regulatory agencies that have oversight of devices and cosmetics (ERMA) to ensure that other products that are used for similar purposes also carry this important safety information.

Please see the letter from ASMI, sent to Mesdafa via email to [REDACTED] on Friday 7th December 2018.

Your details

8 Your details

Name and designation:

[REDACTED]

Company/organisation name (if applicable):

Australian Self Medication Industry Pty Ltd

Address:

[REDACTED]

[REDACTED]

[REDACTED]

Phone number:

[REDACTED]

Email address:

[REDACTED]

9 This submission is:

made on behalf of a group or organisation(s)

10 I am, or I represent an organisation, based in:

Australia

If you selected other, please specify:

11 I am, or I represent, a:

Industry organisation

If you selected health professional, please indicate your type of practice:

If you selected other, please specify:

Publishing submissions and privacy

12 Publishing submissions

You may publish this submission

13 Official Information Act responses

Remove my personal details from responses to Official Information Act requests

14 Commercially sensitive information

This submission does not contain commercially sensitive information

If your submission contains commercially sensitive information, please let us know where.: