

22 March 2018

Mr James Lawson
27 Coolangatta Street
Coomba Park NSW 2428

Dear Mr Lawson

**Re: Algola Seaweed Skin Repair Cream
Our Reference: C259 259-2013**

We have reviewed your draft label for compliance with the requirements for 'cosmetics' in Australia. To meet the requirements for cosmetics a product must:

- Meet the definition of cosmetic in the Industrial Chemicals (Notification and Assessment) Act 1989;
- Not be scheduled in schedules 2, 3, 4 or 8 of the Standard for the Uniform Scheduling of Medicines and Poisons (SUSMP);
- Include only ingredients that are listed on the Australian Inventory of Chemical Substances (AICS) database or are exempt from listing on the database;
- Not include any prohibited chemicals and meet any conditions for use of restricted chemicals;
- Meet any applicable conditions of a cosmetics standard that applies to the product (if any);
- Meet the labelling requirements of the Trade Practices (Consumer Product Information Standards)(Cosmetics)Regulations 1991; and
- Be marketed as a cosmetic.

As the ingredient quantities have not been provided, we have not assessed whether the ingredients are listed in the correct order on the product label (Attachment 1). You should ensure that the ingredients are shown on the label in descending order starting with the highest content by weight or volume. Your manufacturer should be able to give you the correct order without revealing the quantities.

In our view the product, labelled as shown in Attachment 1 to this letter, meets these requirements. This product can be marketed without specific approval from the Therapeutic

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Seaweed Skin Repair Cream, Mr James Lawson

Goods Administration or NICNAS as long as it continues to comply with the above requirements.

In providing this advice I note that there are subjective elements to decisions on whether a claim is 'cosmetic' or not. However, if challenged, I believe you can support the position that these products are appropriately regulated as 'cosmetics'.

Kind regards

Paul Archer
Director, Archer Emery & Associates

Attachment 1

Algola®

SEAWEED
SKIN REPAIR CREAM
"As nature intended"



100ml

Algola Seaweed Skin Repair Cream moisturises, softens, hydrates, soothes and helps to repair damaged, rough, dry, cracked, irritated, chafed, sunburnt and wind burnt skin. It may also improve the appearance of wrinkles, stretch marks, cellulite and pimples, and can be used to moisturise the dry skin associated with conditions such as eczema and psoriasis. **Application** Apply cream 2-3 times per day for best results. **Caution** Avoid direct contact with eyes. If irritation occurs, discontinue use and seek medical advice. **Storage** Store and transport out of direct sunlight and in a cool dry place. **Contains** Vitamins, Minerals, Alginates, Amino Acids and Natural Antibacterial Oils. **Ingredients** Aloe Vera Leaf Gel, Kelp/Seaweed Extract, Coconut Oil, Olive Leaf Extract (And) Ethanol, Glycerin, Cetearyl Oliviate, Sorbitan Oliviate, Jojoba Seed Oil, Avocado Oil, Rosehip Oil, Shea Nut Butter, Carnauba Wax, Xanthan Gum, Bergamot Oil, Lime Oil, Cedarwood Oil.




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