

Let's talk shop.

TGA consultation: Improvements to the regulation of sunscreens in Australia

May 2026

The Australian Retail Council welcomes the opportunity to provide feedback on the Therapeutic Goods Administration's consultation on proposed improvements to the regulation of sunscreens in Australia.

ARC represents Australia's \$444 billion retail sector, the nation's largest private sector employer. Retail employs more than 1.4 million Australians, representing one in ten workers, and is the single largest employer of young Australians aged 15 to 24.

ARC's membership spans the full breadth of Australian retail, from family-owned small and independent businesses, which comprise 95 per cent of our membership, through to large national and international retailers that support thousands of jobs and sustain communities across metropolitan and regional Australia. The sector operates more than 155,000 retail outlets nationwide, with the majority also maintaining an online or e-commerce presence. A significant portion of every dollar spent in retail flows back to employees, suppliers, superannuation funds, and local communities.

ARC is committed to supporting Australian retailers by collaborating and advocating for policy settings and reforms that drive growth, resilience, and long-term prosperity for the retail sector and the millions of Australians who rely on it.

Executive Summary

ARC broadly supports the TGA's objective of strengthening consumer confidence in sunscreen products sold in Australia. Targeted reforms that improve the reliability and transparency of SPF testing, strengthen oversight of testing laboratories, and improve confidence in sunscreen performance are also supported in principle. However, reforms should be proportionate, practical and directed primarily to the parties best placed to manage product testing, formulation, manufacturing and regulatory compliance.

ARC does not support replacing the current numerical SPF framework with categorical protection bands at this stage. The existing SPF system is familiar to consumers and widely used internationally. A move away from this approach risks creating consumer confusion, increasing packaging and compliance costs, and creating unnecessary divergence from global labelling practices.

ARC also supports greater clarity and consistency between therapeutic and cosmetic sunscreen claims where this reduces consumer confusion. However, any changes should be supported by clear guidance, appropriate transition periods and practical arrangements for existing stock.

SPF testing reliability and laboratory oversight

ARC broadly supports measures intended to improve the reliability, transparency and consistency of SPF testing.



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Recent concerns regarding SPF variability and inconsistent test outcomes have highlighted the importance of maintaining confidence in sunscreen claims and the regulatory framework that underpins them. Greater consistency in testing and reporting standards would assist consumers, suppliers and retailers by improving confidence that sunscreen claims are accurate and comparable.

ARC supports, in principle, stronger expectations for testing documentation, traceability and laboratory processes. However, any new accreditation or certification requirements should be implemented carefully and proportionately, with regard to international laboratory capacity, technical feasibility and the potential impact on product availability.

ARC considers that a staged model combining stronger post-market oversight with clearer laboratory expectations is likely to be more practical than introducing highly prescriptive requirements in the immediate term.

ARC also supports the adoption of validated new testing methodologies where they are scientifically robust, internationally recognised and operationally practical. However, new testing methods should not be mandated before there is sufficient laboratory capability, market readiness and clarity on claims such as water resistance.

SPF labelling

ARC does not support replacing the current numerical SPF framework with categorical protection bands. The current SPF numbering system is widely recognised by consumers and broadly aligned with international practice. Moving away from this framework risks creating consumer confusion, unnecessary divergence from international standards, additional packaging redesign and compliance costs, and increased complexity for international suppliers operating within the Australian market.

ARC also notes that any major labelling reforms would require significant lead times for packaging redesign, stock transition and implementation across supply chains.

While improving consumer understanding of SPF claims is an important objective, ARC does not consider that replacing numerical SPF values with categorical descriptors alone is likely to materially improve consumer comprehension. Consumer education and clearer guidance may be more effective mechanisms to improve understanding while maintaining consistency with internationally recognised SPF labelling practices.

If significant changes to SPF labelling are being considered, ARC recommends these be informed by robust consumer testing and further consultation with industry.

Therapeutic and cosmetic sunscreens

ARC broadly supports measures that improve clarity and consistency between therapeutic and cosmetic sunscreen claims where this reduces consumer confusion and unnecessary regulatory complexity.

Consumers are unlikely to clearly distinguish between therapeutic and cosmetic sunscreen classifications, particularly where products make similar SPF claims. ARC therefore supports efforts to improve clarity regarding product presentation and consumer understanding.



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However, ARC encourages the TGA to carefully consider the practical implications of any changes to classification or claims frameworks, including impacts on packaging, supply chains, product categorisation and broader market settings.

Any reforms in this area should be supported by clear implementation guidance, appropriate transition arrangements and practical arrangements for existing stock.

Implementation and transition

ARC encourages the TGA to continue engaging closely with industry as proposals are refined and developed. Several proposals outlined in the consultation paper would benefit from additional technical consideration, consumer research and implementation planning prior to being finalised.

ARC recommends that any reforms include:

- appropriate transition periods for packaging, labelling and stock management;
- clear guidance regarding sponsor, manufacturer, laboratory and retailer responsibilities;
- recognition of international standards and frameworks where appropriate;
- consideration of global supply chain impacts; and
- a practical, staged implementation approach.

Given the global nature of sunscreen manufacturing and supply chains, maintaining international alignment where possible should remain an important consideration throughout the reform process.

Conclusion

ARC broadly supports the TGA's objective of strengthening confidence in sunscreen products sold in Australia and improving transparency within the regulatory framework.

However, reforms should remain proportionate, practical and internationally aligned where possible. Regulatory changes should avoid creating unnecessary compliance burden, supply disruption or consumer confusion, particularly where equivalent outcomes may be achieved through staged implementation, guidance or consumer education.

ARC welcomes continued consultation with industry as the TGA further develops and refines these proposals. Any queries in relation to this submission can be directed to the ARC policy team at policy@retail.org.au.

