

TGA_NICNAS_dont_test.doc

----- Forwarded message -----

From: <lorma.gutierrez@nicnas.gov.au>

Date: Fri, Mar 11, 2011 at 1:54 PM

Subject: Fw: Letter of Request for Information - NICNAS [SEC=UNCLASSIFIED]

To: Daniel

Dear Daniel,

Thank you for your enquiry.

The regulation of chemicals in Australia is shared by a number of Government agencies, at federal, State and Territory level, which operate in a complementary manner. There are four national chemicals assessment and registration schemes which cover food, industrial chemicals, pharmaceuticals and agricultural (pesticides) and veterinary chemicals.

In your e-mail, it is my understanding that you are seeking information on the long-term safety of silicofluoride when ingested. NICNAS is not a testing agency and therefore, we don't have test results for silicofluoride. For me to be able to assist you further, could you please clarify the intended use of silicofluoride and what information do you require in relation to its intended use. It appears in your e-mail that the use, (for example, fluoridation in town waters), is outside the scope of NICNAS. If it is outside the scope of NICNAS, a clear indication of the use will also guide me in forwarding this information to the correct government agency.

I trust that the information is of help to you.

Kind regards,

Lorma Gutierrez | Senior Regulatory Scientist| Existing Chemicals

NICNAS - Australian Government Department of Health & Ageing

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NICNAS Registration

Sent by: John Attard

10/03/2011 09:35 AM

To Sami Syed/NICNAS/Health@Health_gov_au

cc Lewis Norman/NICNAS/Health@Health_gov_au,

new.chems.enquiries@nicnas.gov.au, Marion

Healy/NICNAS/Health@Health_gov_au

Subject Fw: Letter of Request for Information - NICNAS [SEC=UNCLASSIFIED]

----- Forwarded by John Attard/NICNAS/Health on 10/03/2011 09:28 AM -----

Daniel

To info@nicnas.gov.au

cc new.chems.enquiries@nicnas.gov.au, registration@nicnas.gov.au,

marion.healy@nicnas.gov.au

10/03/2011 12:08 AM

Subject Letter of Request for Information - NICNAS [SEC=No Protective Marking]

SUBJECT: Letter of Request for Information - NICNAS
SENDER: Mr Daniel *****
ATTN: Dr Marion Healy <marion.healy@nicnas.gov.au>
POSITION: Director, NICNAS

Dear NICNAS,

This letter follows my previous inquiry to you in relation to the industrial chemicals, sodium fluorosilicate (Na₂SiF₆), and fluorosilicic acid (H₂SiF₆). I have since contacted the TGA regarding the status of these chemicals. The TGA has replied as follows:

"As these products have not been evaluated by the TGA for quality safety or effectiveness we are unable to provide you with the information you seek. May I suggest you contact the National Industrial Chemicals Notification and Assessment Scheme (NICNAS) who may be able to assist you with your enquiry." (full letter attached as PDF)

As you can see from the full letter, my original inquiry asked specifically for long-term human health studies on these particular chemicals.

Since neither the chemical manufacturers (i.e. Incitec Pivot, Orica, et al), the TGA, NATA, the NHMRC, the Department of Health, nor any other body I have been referred to throughout approximately the past two weeks has been able to provide these studies, I hereby ask you (i.e. NICNAS - nicnas.gov.au) for the safety tests/data that the aforementioned organisations have been unable to provide.

Alternatively, if NICNAS is likewise unable to verify the long-term safety of silicofluoride ingestion (including infant exposure) as requested of the aforementioned bodies (nb. all of my letters are available upon request), then I respectfully request that NICNAS points me in the direction of any credible Australian research body who has this data.

It is worth noting, Dr Healy, that Incitec Pivot's MSDS states (in relation to fluorosilicic acid): "At the concentrations used in fluoridation of town water supplies, it is harmless." (<http://data.rmt.com.au/msds/3082468.pdf>); Orica also suggests similar confidence in its silicofluoride product(s) (<http://www.órica-chloralkali.com/?page=55>). When asked for specific references, however, neither the manufacturers nor the above-mentioned organisations are able to bolster such statements with specific references.

Surely, somewhere in Australia - I am hoping, in NICNAS' archives - are the safety tests to justify this confidence in the industrial products in question.

Thank you for your time. I look forward to your reply.

Sincerely,

--

Daniel *****

[attachment "TGA reply.pdf" deleted by Sami Syed/NICNAS/Health]