

**GUIDANCE**NOTE

**PACKAGING FOR ALCOHOL-BASED HAND SANITISERS**

This guidance note has been developed to assist businesses involved in the supply, handling or storage of hand sanitisers during the COVID-19 pandemic to meet work health and safety requirements.

In response to the COVID-19 pandemic there has been a major increase for hand sanitiser products being supplied to the Australian public. State and Territory Poisons Information Centres have received a threefold increase in the number of calls relating to inadvertent consumption of hand sanitisers due to inappropriate packaging.

Some products are packaged using food and drink containers such as foil sachets, pouches with a spout or containers with a pop-top lid. The use of food and drink containers can pose a serious risk to the safety of young children who, because the packaging is similar to or in fact a drink or food container, mistakenly consume the contents.

**OVERVIEW**

Alcohol-based hand sanitisers are excluded from regulation as therapeutic goods if they meet specified formulation, manufacturing, labelling and advertising requirements as set out on the [Therapeutic Goods Administration website](https://www.tga.gov.au/).

Some ingredients found in alcohol-based hand sanitiser are flammable liquids and can also cause irritation to skin and eyes, their packaging must meet the requirements for hazardous chemicals under work health and safety laws.

Under the WHS laws, there are specific requirements for businesses that manufacture or import hazardous chemicals (such as hand sanitisers), including businesses that re-package or re‑label a hazardous chemical with their own product name.

The hand sanitiser must not be packaged in or transferred into a container that usually contains food or drinks or could be mistakenly identified as containing food or drinks – this includes containers that were originally designed or intended to hold food or drinks.

Retailers who supply customers with hand sanitiser in the customer’s own container are responsible for ensuring that the container is suitable for this purpose per the packaging requirements in Section 2 of Schedule 9 of the [*Work Health and Safety Regulation 2011*](https://www.legislation.act.gov.au/sl/2011-36/).

**ACTION REQUIRED**

The [Therapeutic Goods Administration website](https://www.tga.gov.au/) sets out the labelling requirements for the front and back of containers holding alcohol-based hand sanitiser, including the warning **DO NOT DRINK** which must appear on the front label.

Businesses which intend to manufacture alcohol-based hand sanitisers should refer to information on the [Therapeutic Goods Administration website](https://www.tga.gov.au/) regarding the way in which these products must be manufactured, and to information on the [Safe Work Australia website](https://www.safeworkaustralia.gov.au/manufacture-or-supply-alcohol-based-hand-sanitisers-covid-19) which explains how the hazardous chemicals requirements apply to the manufacture of these products.