

## Wright, Dean

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**From:** Resurreccion, Dixie  
**Sent:** Wednesday, 25 January 2012 12:22 PM  
**To:** 'Reys, Ben'; 'Buddhadasa, Saman'; 'Anne.Coyle@measurement.gov.au'  
**Cc:** Wallner, Peter; Wright, Dean  
**Subject:** re: Confidential-Testing - Hydrogen peroxide and carbamide peroxide concentrations in certain products [SEC=IN-CONFIDENCE]  
**Follow Up Flag:** Follow up  
**Flag Status:** Orange  
**Attachments:** product safety - hydrogen peroxide and carbamide peroxide in over the counter (otc) teeth whiteners (D2012-00014001).xls

Hi Ben

Thank you for your reply regarding our quote for testing. On the basis of the quote you have provided below (\$65 per sample) for the hydrogen peroxide testing, the ACCC will be looking to send NMI the following samples containing stabilised hydrogen peroxide:

- 2 x Bright White Express - Advanced Teeth Whitening Kits (each kit has 2 x 5ml syringes containing 12% Hydrogen Peroxide; 1 x 5ml syringe containing 9% Hydrogen Peroxide).
- 1 x ProTeeth Whitening Pen (containing 1 x 2.5ml syringe containing 16% Hydrogen Peroxide)

**Attached** for your reference is more detailed information on the product samples to be tested. Can you please advise whether the volume of the solutions provided are sufficient to conduct testing?

Can you also please provide us with the following information:

- Are there any set up costs?;
- format of final report (we are interested in the concentration results for each syringe as opposed to total concentration);
- the appropriate contact and address to send the samples to; and
- if there are any special safety procedures we are required to perform to enable the samples to be sent to you.

We have marked each sample (including the contents within) with a corresponding label number. We will require that NMI retain the samples for a period of time, in the event any re-testing is required. We also require that the outer box and contents (including instructions) be kept in tact with the samples and not disregarded/disposed of. Can you please advise whether this will pose any issues?

Thanks and kind regards  
Dixie

**Dixie Resurreccion**

Senior Project Officer – Chemical Assessment & Information Standards | Product Safety Branch  
**Australian Competition & Consumer Commission**  
23 Marcus Clarke Street Canberra 2601 |  
<http://www.accc.gov.au> | <http://www.productsafety.gov.au> | <http://www.recalls.gov.au>

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**From:** Reys, Ben [mailto:ben.reys@measurement.gov.au]  
**Sent:** Wednesday, 31 August 2011 4:43 PM  
**To:** Resurreccion, Dixie

27/02/2012

**Cc:** Wallner, Peter; Buddhadasa, Saman; Coyle, Anne

**Subject:** RE: Confidential-Testing - Hydrogen peroxide and carbamide peroxide concentrations in certain products [SEC=IN-CONFIDENCE]

Dear Dixie,

Apologies for the delay in getting back to you but please see below for responses to your queries.

Should you have any further questions or require a formal quotation please contact myself or Saman on the numbers below.

Kind regards

Ben Reys  
Business Development Manager  
National Measurement Institute  
Department of Innovation, Industry, Science and Research

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National Measurement Institute  
1/153 Bertie Street Port Melbourne 3207 VIC, Australia  
Ph: 61-3-9644 4888 Fax: 61-3-9644 4999  
Mobile: 0413 947 990  
E-mail: [ben.reys@measurement.gov.au](mailto:ben.reys@measurement.gov.au)  
Internet: <http://www.measurement.gov.au>  
ABN 74 599 608 295

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**From:** Resurreccion, Dixie [mailto:Dixie.Resurreccion@acc.gov.au]

**Sent:** Wednesday, August 24, 2011 3:27 PM

**To:** Reys, Ben; Buddhadasa, Saman

**Cc:** Wallner, Peter

**Subject:** Confidential-Testing - Hydrogen peroxide and carbamide peroxide concentrations in certain products [SEC=IN-CONFIDENCE]

### **Confidential - Preliminary enquiry only**

Dear Ben and Saman

The ACCC is investigating the feasibility of testing peroxide concentration levels in certain products available in Australia. Could you please advise your capability to test for hydrogen peroxide and carbamide peroxide concentrations in teeth whitening products and hair bleaches? I would appreciate your response to the following points:

- **Experience with this type of testing** . NMI and NMI analysts have performed peroxide analyses in dairy products by a colourimetric method for many years. The analysts have also performed similar titration methods to the method proposed
- **Proposed test method** Titration with potassium permanganate solution. Based on method as per Food Chemicals Codex (pages 222-223 FCC Ed.6 2004)
- **Accreditation status for the lab and test (NATA or comparable body?)** Lab is NATA accredited for similar methods but is not specifically accredited for this method
- **LOQ/LOD** LOQ is 0.1%, LOR is 0.2%
- **Cost per sample (approximately 20-30 samples)** \$65 per sample excl GST
- **Delivery time of final analytical report from time of sample receipt.** 10-15 working days from sample receipt

27/02/2012

Kind regards  
Dixie

**Dixie Resurreccion**

Senior Project Officer – Chemical Assessment & Information Standards | Product Safety Branch

**Australian Competition & Consumer Commission**

23 Marcus Clarke Street Canberra 2601 |


<http://www.accc.gov.au> | <http://www.productsafety.gov.au> | <http://www.recalls.gov.au>

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27/02/2012

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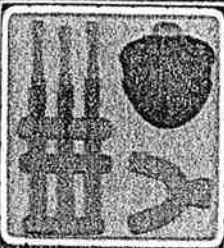
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# PROFESSIONAL TEETH WHITENING™

PROFESSIONAL TEETH WHITENING PENS



PROFESSIONAL TEETH WHITENING PEN  
[www.professionalteethwhitening.com.au](http://www.professionalteethwhitening.com.au)

**Warning:** Use of this product is not intended for use on children's teeth. Use only on permanent teeth.  
**Caution:** Avoid contact with eyes, nose, mouth, lips, and skin. If contact occurs, rinse thoroughly with water.

**Directions:** Apply to clean, dry teeth. Use the pen applicator to apply the product to the teeth. Rub gently for 1-2 minutes. Rinse thoroughly with water. Use once daily for best results.



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 Which outpower  
 the rest of the  
 world. It's not  
 just a tool. It's  
 a revolution.

**Y**

**TECHNICAL SPECIFICATIONS**  
 Model: Y-1000  
 Weight: 2.5kg  
 Power: 1000W  
 Voltage: 230V  
 Frequency: 50Hz  
 Dimensions: 150x100x50mm

**CONTACT US**  
 Phone: +353 1 234 5678  
 Email: info@ybrand.com  
 Website: www.ybrand.com

Photo

3 Teeth whiteners 11/01/2012 Online

Bright White Express:  
Advanced Teeth  
Whitening Kit

Home teeth  
whitening kit

Pro Teeth Whitening PO BOX 2696  
WELLINGTON PT QLD 4160  
AUSTRALIA

- On primary pack:**
1. Not recommended for Pregnant or Nursing women, persons under 16, or persons with allergies to Hydrogen Peroxide
  2. 2 Gel Syringes 12% HP, 1 Gel Syringe 9% HP; PLUS Detailed Instructions
  3. Contains Stabilized Hydrogen Peroxide, Xylitol, Activator, Hydrating and Desensitizing agents.

- Inside the primary pack**
4. 2 Gel Syringes are labelled with the words 12 % Hydrogen Peroxide
  5. 1 Gel Syringe is labelled with the words 9 % Hydrogen Peroxide
  6. 1 x Advanced Teeth Whitening Kit usage instructions sheet is provided
  7. there are no other labels inside the pack

- Usage instructions**
8. Not recommended for Pregnant or Nursing women, persons under 16, or persons with allergies to Hydrogen Peroxide. Consult your Dentist if in doubt.
  9. Ingredients: Hydrogen

**Pack contains: 1 x set of usage instructions and 1 x Sticker on the outer pack with the heading 'POISON' and the following words: Hydrogen Peroxide used in Teeth Whitening preparations is classified as a Poison. WARNING: Irritant. Safety Directions: Attacks Eyes - protect eyes when using. Standard Statements: S1 - If skin or hair contact occurs, remove contaminated clothing and flush skin and hair with running water. E2 - If in eyes, hold eyelids apart and flush the eye continuously with running water. Continue flushing until advised to stop by a Poisons Information Centre (e.g. phone Australia 131 126; New Zealand 0800 764 766) or a doctor, or for at least 15 minutes; G3 - If swallowed, do NOT induce vomiting; A - For advice, contact a Poisons Information Centre (e.g. phone Australia 131 126;**

**Contains Stabilized Hydrogen Peroxide, Xylitol, Activator, Hydrating and Desensitizing agents. Contains: 2 x Syringes with 12% Hydrogen Peroxide gel, and 1 x Syringe with 9 % Hydrogen Peroxide gel. [Note: syringes are 5ml each]**

\$117.90  
(for x 2 kits)

2 Teeth whiteners 18/11/2012 Online

Pro Teeth Whitening:  
Professional Teeth  
Whitening Pen

Teeth whitening  
pens

Pro Teeth Whitening PO BOX 2696  
WELLINGTON PT QLD 4160  
AUSTRALIA

- On the pack:**
1. Caution: For cosmetic use only. Do not swallow. Avoid contact with eyes. Store in a cool, shaded place out of reach of children. Temporary tooth sensitivity may occur. Discontinue use upon sustained discomfort or irritation.
  2. Ingredients: Glycerin, 16% Hydrogen Peroxide, Carbomer, Peppermint Oil, Triethanolamine, Desensitizing agent
  3. 12M symbol
  4. 2.5ml Made in China
  5. Prominent claims include, "Use anywhere, anytime" & "Won't damage gums or teeth"
  6. Directions provided (1. Brush & Floss; 2. Dry teeth; 3. Twist base until gel is on brush; 4. Smile wide keeping lips away from teeth; 5. Apply a think layer of gel to teeth; 6. Relax lips after 30 sec; 7. Avoid eating or drink for 30 mins; 8. Use twice daily).

- Inside the primary pack**
7. No other information provided
  8. No label on whitening pen

\$29.95

Glycerin, 16% Hydrogen  
Peroxide, Carbomer,  
Peppermint Oil,  
Triethanolamine, Desensitizing  
agent [Note: syringe is 2.5ml]

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## ACCC hydrogen peroxide and carbamide peroxide in over the counter (OTC) teeth whiteners

Label No.	Product Category	Date of purchase	Place of purchase	Product Name	Product Sub-name	Supplier details importer/distributor	Labelling Info/Claims	Sampled by	Cost \$	Comments	Ingredients	Phase
1	Teeth whiteners	18/12/2011	Online	Bright White Express: Advanced Teeth Whitening Kit	Home teeth whitening kit	Pro Teeth Whitening PO BOX 2696 WELLINGTON PT QLD 4160 AUSTRALIA	<p><b>Labelling Info/Claims</b></p> <p><b>On primary pack:</b></p> <ol style="list-style-type: none"> <li>Not recommended for Pregnant or Nursing women, persons under 16, or persons with allergies to Hydrogen Peroxide</li> <li>2 Gel Syringes 12% HP, 1 Gel Syringe 9% HP; PLUS Detailed Instructions</li> <li>Contains Stabilized Hydrogen Peroxide, Xylitol, Activator, Hydrating and Desensitizing agents.</li> </ol> <p><b>Inside the primary pack</b></p> <ol style="list-style-type: none"> <li>2 Gel Syringes are labelled with the words 12 % Hydrogen Peroxide</li> <li>1 Gel Syringe is labelled with the words 9 % Hydrogen Peroxide</li> <li>1 x Advanced Teeth Whitening Kit usage instructions sheet is provided</li> <li>there are no other labels inside the pack</li> </ol> <p><b>Usage instructions</b></p> <ol style="list-style-type: none"> <li>Not recommended for Pregnant or Nursing women, persons under 16, or persons with allergies to Hydrogen Peroxide. Consult your Dentist if in doubt.</li> <li>Ingredients: Hydrogen</li> </ol>		\$49.95	<p>pack contains: 1 x set of usage instructions and 1 x A4 size black laser printed loose sheet</p> <p>'Please Read First' inserted into the envelope. Words consist of the following:</p> <p><b>Hydrogen Peroxide used in Teeth Whitening preparations is classified as a Poison. WARNING:</b> Irritant. <b>Safety Directions:</b> Attacks Eyes - protect eyes when using. <b>Standard Statements: S1</b> - If skin or hair contact occurs, remove contaminated clothing and flush skin and hair with running water. <b>E2</b> - If in eyes, hold eyelids apart and flush the eye continuously with running water. Continue flushing until advised to stop by a Poisons Information Centre (e.g. phone Australia 131 126; New Zealand 0800 764 766) or a doctor, or for at least 15 minutes; <b>G3</b> - If swallowed, do NOT induce vomiting; <b>A</b> - For advice, contact a Poisons</p>	<p>Contains Stabilized Hydrogen Peroxide, Xylitol, Activator, Hydrating and Desensitizing agents. Contains: 2 x Syringes with 12% Hydrogen Peroxide gel, and 1 x Syringe with 9 % Hydrogen Peroxide gel. [Note: syringes are 5ml each]</p>	1