

Crayons and Other Products At-Risk of containing Asbestos or Talc

Risk

Asbestos has been found in several shipments of crayons and is thought to have come from the use of contaminated talc in the product. This is possible because asbestos and talc deposits are frequently found together and stringent quality control is required to ensure that contamination does not occur.

Asbestos is a hazardous substance and a prohibited import so suppliers of products that may contain talc need to take precautions to ensure that they are not contaminated.

Australian Border Force

Australian Border Force have been targeting imports of crayons since September 2015 to ensure that importers have undertaken appropriate due diligence to ensure that their shipments don't contain any asbestos.

In 2016, ABF worked with importers to review and validate their due diligence processes. The actions suggested below have been developed based on the results of that activity.

Shipments are targeted for scrutiny according to a risk-based intelligence process. Commodity and country of origin are a part of that equation and shipments of crayons should be considered as a high risk.

ABF's official guidance on asbestos can be found here:

<http://www.border.gov.au/Busi/Impo/Proh/Asbestos>

What Suppliers Should Do

1. Reduce the risk of product being contaminated
 - a. Use an alternative formulation that does not include talc
Check with your supplier as they may have talc free alternatives available
 - b. Ensure that your supplier uses food or cosmetic grade talc
These grades have more stringent QA processes than industrial grade to ensure that contamination does not occur
2. Develop a QA / Import process to check for asbestos contamination and ensure that appropriate documentation is available on import.
 - a. The presence of asbestos or talc cannot be verified visually so you will need the product to be tested.
 - b. Not all laboratories are equal
Any test must be performed by a laboratory accredited by NATA or by a NATA recognised entity to do that particular test, e.g. CNAS in China.

Note that accreditation may be given for only a part of a given standard so these need to be checked carefully

Acceptable QA Processes

1. For At-Risk Products that **do not** use Talc
 - a. Your compliance documentation should include an SDS or Toxicology report listing the ingredients
 - We would not expect talc to be in the list
 - b. You should also hold a test report dated within 12 months of the shipment date of the product that confirms that there is no talc in it.
 - An acceptable standard for this is GB 5009.269-2016 – Determination of talc in foods.
 - c. Ensure that the documentation above is available at time of import.
2. For At-Risk Products that **do** use Talc
 - a. Option 1
 - i. Implement a traceable process whereby talc inputs are tested and confirmed to be asbestos free (by a NATA accredited laboratory)
 - The process would require that batch codes of finished product are able to be matched with the batches of tested talc
 - ii. You should also hold a test report dated within 12 months of the shipment date of the product that confirms that there is **no** asbestos in it.
 - An acceptable standard for this is AS 4964
 - iii. Ensure that documentation related to specific batches is available at time of import
 - b. Option 2
 - i. Implement a process to validate that each shipment of product is free of asbestos.
 - This would require sampling of the shipment and testing by a NATA accredited laboratory
 - An acceptable standard for this is AS 4964
 - The samples may be sent to an Australian laboratory for testing or an appropriately qualified laboratory at source.
 - Care should be taken on the qualification of the laboratory if using an overseas service as there have been cases where asbestos has been found in shipments that have been tested by overseas laboratories to be asbestos free
 - You should have the results before shipment as it will be expensive to deal with failed goods after arrival in Australia. The goods and possibly any others comingled with them in a container will need to be destroyed in accordance with asbestos removal requirements.
 - ii. Ensure that documentation related to the shipment is available at time of import

Test reports

Tests must be performed by a laboratory accredited by NATA or by another accreditation authority recognised by NATA.

Test reports to AS 4964 must state:

- The test method used
- The date and origin of the sample
- A description of the sample (and sub-sample if applicable) including weight, size, colour etc.
- Whether fibres are detected under Polarizing Light Microscope (PLM)/ Dispersion Straining (DS) at the detection limit
- The type of fibre detected i.e. asbestos fibre type, organic fibre, synthetic mineral fibres, mineral fibres of unknown type (may or may not be asbestos and require confirmation by another technique)
- The name of the analyst undertaking the testing.

The report must be for all six types of asbestos and must be related to the actual shipment as described in the option chosen above.

Contact compliance@austoy.com.au if you have questions on this document.