

18<sup>th</sup> October 2018

To Whom It May Concern,

**RE: CONSULTATION ON DRAFT DEFINITIONS – GST TREATMENT OF FEMININE HYGIENE PRODUCTS**

This is a submission in relation to the “Goods and Services Tax (GST) Treatment of Feminine Hygiene Products”. We appreciate the opportunity to make a submission.

Asaleo Care is a leading Australasian personal care and hygiene company and proud to be the only manufacturer of feminine hygiene products in Australia. Our feminine hygiene products, sold under the Libra brand in Australia, New Zealand, Fiji and the Pacific Islands, have been manufactured for 40 years at our plant in Springvale, Victoria.

We are a leading designer, manufacturer and supplier of feminine hygiene products with deep knowledge and expertise on menstruation and feminine hygiene care. We believe there are a number of matters that should be considered in relation to the draft definition of feminine hygiene products that have implications for removal of the GST on these products.

The draft definition correctly captures the broad range of products that can be described as “feminine hygiene products” used to “absorb or collect menstrual or vaginal blood” during the menstrual cycle and / or for management of “pre and post birth bleeding”. We are concerned, however, that the draft definition may exclude products from GST-free status that are used for what might be classified as “general hygiene use” (e.g. Panty Liners) but that are used by consumers throughout the menstrual cycle including for feminine hygiene needs other than blood absorption or collection.

The term “menstrual cycle” refers to the physiological changes from the beginning of one menstrual period to the beginning of the next. The menstrual cycle can be broken up into four different phases, with the menstrual cycle starting on the first day of the menstrual period (referred to as day one) and ends the day before the next period begins. The menstruation phase where blood is discharged usually lasts 4 – 7 days. It is important to recognise that women experience discharge of mucus, blood and other bodily fluids throughout the entire menstruation cycle, which typically lasts 28 days.

Women use a broad range of products to manage their menstrual cycle, as every women’s cycle is different. The products set out below are used interchangeably to manage different menstrual cycle needs, and dependent on personal preference:

- Pads
- Tampons
- Liners
- Cups
- Reusable underwear / pads

- Period underwear
- Etc.

We propose that the draft definition of feminine hygiene products should refer to:

- a) Products that are specifically designed to manage absorption or collection of menstrual or vaginal blood and the discharge of mucus and other bodily fluids related to the menstrual cycle.
- b) Panty liners and maternity pads specifically designed to manage the absorption or collection of menstrual or vaginal blood and the discharge of other bodily fluids pre and post child birth.

It is our view that the proposed definitions above address the needs women and girls have when managing their menstrual cycle and pre and post birth feminine hygiene. It follows that these broader definitions for GST-free status should appropriately include products such as Panty Liners which are used throughout the menstrual cycle. Under the current draft definition, products such as Panty Liners may be deemed as being marketed for use by consumers for “general hygiene” and therefore excluded from GST-free status. We do not believe this is an outcome intended by the Federal Government when introducing this change.

If our proposed changes to the definition of “feminine hygiene products” is not acceptable, it is important to recognise that consumers regularly use products that may be deemed to be marketed for “general hygiene use” such as Panty Liners for menstrual or vaginal blood collection. The use of such products in this way is a reflection of the different needs women and girls have to manage their menstrual cycles i.e. some women will experience heavier blood loss and other women less blood loss. Accordingly, women and girls require a range of products (including Panty Liners for what might commonly be referred to as a “light period”) to suit their menstrual cycle management needs. The definition of feminine hygiene products must therefore not exclude (either directly or inadvertently) products deemed to be marketed for general hygiene use which consumers use for menstrual or vaginal blood loss. Accordingly, the final definition of feminine hygiene products should take these needs into account.

Thank you again for the opportunity to make a submission. If you would like to discuss our submission or require more information, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'David Griss', is written over a light blue circular stamp.

**David Griss**  
**Executive General Manager Human Resources and Corporate Affairs**