



Christian Rand Llewellyn

P. T. A. A. Inc. [REDACTED]

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New South Wales

12th April, 2021

To whom it may concern

The P. T. A. A. alongside The N. S. W. and Qld. Licenced Tattooists Group would like to strongly oppose the proposed amendments to the Medicines and Poisons Act in relation to Tattoo inks and pigments on the following grounds.

Simply put the proposed legislation is not fit for purpose.

No consultation has taken place at all with major stakeholders such as this Association and group, ink manufacturers, major distributors, suppliers or the wider Industry to find a workable solution. Consulting with one minor organisation and a single supplier does not constitute adequate consultation and contravenes ethical data research gatherings.

If a proactive approach to public health is the policy objective, then limiting the purchase of supplies to un-licenced operators and policing their un-hygienic practices should be of a far higher priority.

Professional Artists are already diligent in their pigment choices and buy only from reputable companies who supply medical safety data sheets, batch numbers, expiry dates and ingredient lists.

Despite possessing a list of all licenced tattoo artists and operators in the State there has been no consultation with the broader Industry. There has also been no consultation or due process in communicating with overseas manufacturers.

There has been no credible science or evidence presented that warrants this proposed action. No peer-reviewed studies over a prolonged period that indicate any public health risk have been presented. No departmental standard has been presented to industry nor has an explanation of how to comply with the vague Compliance Analysis Certificate. This should not fall as a responsibility of tattooists and small business owners.

The majority of professional tattoo artists in Qld use pigments manufactured in USA, EU and UK that are already compliant to regulations in those locations. Should these companies not comply with the vague regulations that are proposed for Qld the entire tattoo industry in Qld will be forced underground or out of business. The ramifications for the economy and the community will be massive. This will cause the public to seek their tattoos in unregulated situations such as backyard operators and /or fly into South East Asian countries who will not implement any measures.

The potential for these changes to push a legitimate regulated industry underground cannot be ignored. What is proposed is actually impossible to comply with. We urge you to undertake further consultation and not pass this legislation in its current form

Yours Sincerely

Mr C. Rand Llewellyn
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Rand Family Tattoo
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