

Sub 8

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1. Prominence of Active Ingredients

The active ingredient (generic drug name) should be larger in font size than the brand name. With the ever expanding number of generic brands, it has become very confusing for patients. Some pharmacies may stock more than one generic brand and if the patient is admitted to hospital, they may be discharged on a different brand again. Having the generic name (active ingredient) as the prominent name on the packaging will reduce confusion amongst patients as they will begin to talk about the active ingredient names rather than brand names.

I support and agree with the other suggested changes in Section 1.

3. LASA Labelling/Packaging:

I agree with the proposed changes but would like to emphasise the need for the prominent name on the packaging to be that of the active ingredient and not of the brand name. The idea behind this is to educate patients what the active ingredients are, rather than what brands are and thus reduce confusion.

4. Medicine Information Box:

I agree with proposed changes, however with respect to situations when a product has more than three active ingredients – in the text box it should specifically inform the consumer to “refer to package insert to obtain full list of active ingredients.” This is relating to the content of the Medicines Information Box and so it is simply a comment that needs to be considered for future reference when the content of information in the box is discussed

5. Dispensing Label:

I support the proposed regulatory changes for dispensing label space. In addition, it is important that there is sufficient space to allow for the addition of any Cautionary and Advisory Labels to be placed on the package. This is an important step forward so that information on the packaging is not obscured.

6. Blister Pack Label:

I support proposed changes for labelling on blister strips.

7. Small Container Labels:

I support the proposed changes for small container labels

8. Pack Inserts:

Whilst it may not be within the scope of this consultation, for future reference; on the outside label of the pack it should inform the consumer that there is a pack insert with further information. Also, I

think if pack insert information is available on the internet, the website should be provided on the outside label of the pack.

General Question on establishment of a labels and packaging advisory committee

It is important to include relevant stakeholders to provide appropriate advice to the TGA. Patients, Carers, Pharmacists, Nurses, Doctors (all from both community and hospital settings) along with the pharmaceutical industry are essential. Disregarding feedback from this committee (and stakeholders) that encounter medication labelling and packaging issues each day; will mean that practical, long term resolutions are not found.