

Attention: **TGA labelling and packaging review**  
**Requested Feedback**

An excellent document well prepared thanks to the active and creative committee at the TGA. With respect to p39 of the TGA documents, I wish to agree that an Advisory Panel is essential to carry forward with the documented suggestions.

I wish to offer some suggestions as asked for by the TGA Medicine Labelling and Packaging Review:

- **Advisory labels to be pre-printed by manufacturer:**

e.g. Issue 18: **Include THE red triangle  (advisory label 1, drowsiness warning) when required by law**

- **An image of the tablet etc.**

e.g. Issue 25: **"I wonder what THIS tablet looks like?" All prescription packs should include a description of the medication e.g.**

**a. What colour Is this tablet?**

**b. What shape: oval or round or capsule-shape etc.?**

**c. What markings?**

**d. Is it scored or not?** Maybe the printing ink is TOO EXPENSIVE to allow inclusion of these images on the packs? I wonder?

- **BLISTER PACKS TO BE PRINTED ON BOTH SIDES**

- TGA ref p19, point 1.7 on expiry dates etc at the end of medication packs **TO INCLUDE DRUG NAME**: Issue 23. "Wow - this is getting close to what the REAL WORLD wants !" If only the bar code was on the side of the pack.



- It is generally the end of the pack which is displayed once ethical stock is stacked on to dispensary shelves. **Black printing of expiry dates on a white background** is essential.
- 30: **Disease Logo**: Where appropriate, include a logo of the disease or health issue to assist patients to readily advise what their medication is for. e.g. For diclofenac tablets, include a logo of a bone joint
- To have drug name details on all six sides, not 3 sides as proposed in the draft. Just another major safety issue
- 27: **Braille to be impressed on all manufacturers' labels.** After discussions with Vision Australia, this is perceived as an imperative PLUS to have Braille impressed on all medication. It would be an obvious advantage if our Department of Health and our TGA offered incentives to manufacturers to upgrade their labelling accordingly to include this essential benefit.

- 28: **2D (MATRIX CODE or QR = QUICK RESPONSE BARCODE) IMAGES = 21st Century BAR CODES:** 2D (matrix code or QR) images are able to store a lot more information than traditional bar codes. Why not suggest to manufacturers to include the 2D (Matrix) Code on their prescription and OTC medication packs? So, what are the **benefits** to pharmacy and patients?

How about this:

- A **vision-impaired patient** scans the 2D code on his medication with his **SmartPhone**, and the SmartPhone instantly replies:
- "100 Simvastatin Tablets 20mg"
- **Wow! This could also be loaded to provide dosage guides and/or basic Consumer Medical Information (CMI) info. on the manufacturers' drug packs.**
- This could also be set up on pharmacy dispensary software so that labels will print out a 2D (Matrix Code or **QR BARCODE = Quick Response Barcode**) image providing Dr's instructions, drug name etc. on each label.
- **Why not have this included on most OTC products? Why not?**



Figure 2

- 29: **EXPIRY DATES - Warning Alert:** *Current barcodes to be upgraded* to allow integration of **EXPIRY DATES**. A warning message will be highlighted during scanning to warn of expiry of medication within e.g. three months from now.

A few extra vital recommendations:

12. Providing manufacturer's free-call enquiry contact details e.g. a/ **1800 telephone** and b/ **website links**

13. hot-link to Poisons Info hotline

website: <http://www.chw.edu.au/poisons/index.htm> and Poisons Info Hotline Tel No = 13 11 26

14. [www.mothersafe.org.au](http://www.mothersafe.org.au) **Mothersafe Hotline**. 1800 647 848. Call this number for advice re the safety of medications and alternative health therapies while pregnant or breastfeeding.

Steve Cohen B Pharm MPS

[www.SmartPrescriptionPacks.com.au](http://www.SmartPrescriptionPacks.com.au)