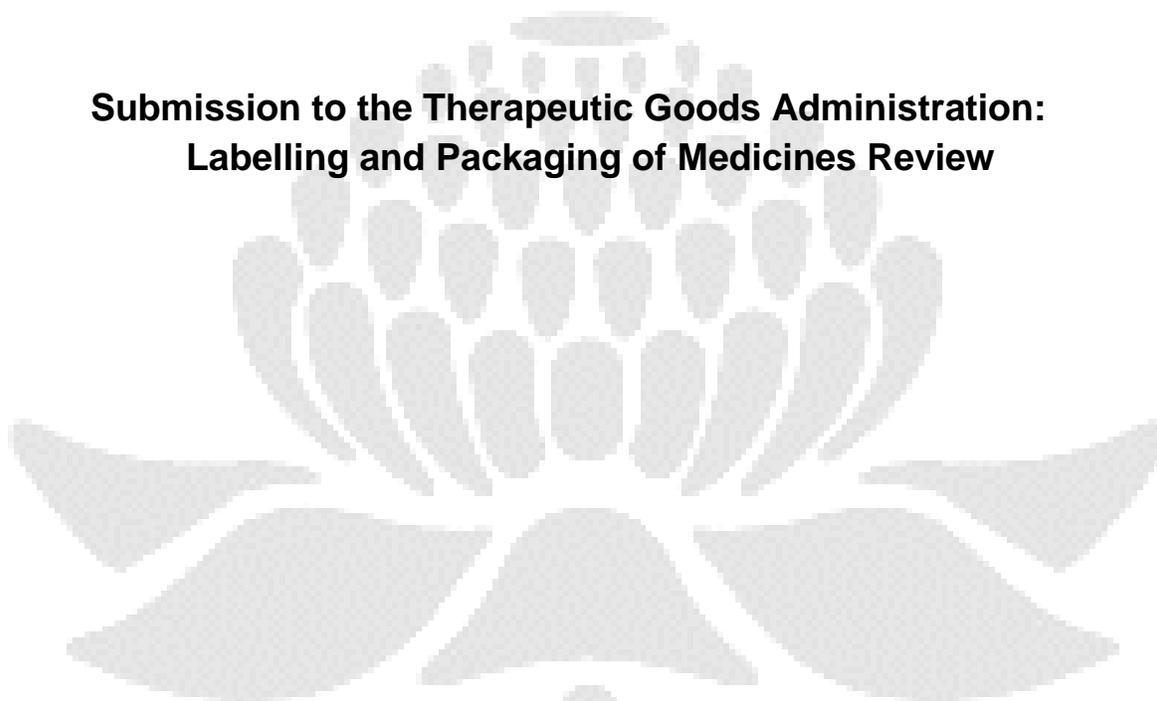


# Combined Pensioners & Superannuants Association

OF NEW SOUTH WALES INC



## Submission to the Therapeutic Goods Administration: Labelling and Packaging of Medicines Review



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## **Introduction**

CPSA was founded in 1931 in response to pension cuts. CPSA is a non-profit, non-party-political membership association which serves pensioners of all ages, superannuants and low-income retirees. The aim of CPSA is to improve the standard of living and well-being of its members and constituents. CPSA has approximately 140 Branches and affiliated organisations with a combined membership of over 29,000 people living in all parts of NSW. CPSA welcomes the opportunity to participate in the labelling and packaging of medicines review. This submission will focus on making recommendations on how current packaging could be improved to make them more user-friendly for older people.

As older people are among the largest demographic taking medication, and often multiple medications on a regular basis, it is crucial that the active ingredients and instructions on when and how to take the medication is clearly outlined in large, clear font and in easy to understand language. This should assist in minimising administrative error. Crucial details including potential side effects should be outlined in clear, dark print of a reasonable size.

## **Prominence of active ingredients on medicine labels**

CPSA supports the proposed change that the active ingredients have equal prominence with the brand name, both in size and location. However, CPSA would like to see the proposal go one step further, so that all medications are prescribed and labelled primarily under their medical name with the brand name as secondary. This would minimise confusion, not only for patients taking the medication but when speaking to doctors and medical staff about what they are taking. This would also assist in reducing double dosing, where people take the brand name and then unknowingly a generic drug with the same active ingredient.

## **Look-alike and sound-alike medicine brand names and look-alike packaging and branding**

CPSA supports the regulatory changes surrounding sound-alike and look-alike branding in so far as they minimise consumer confusion about the differing medicines available as well as reducing the likelihood of receiving and taking the incorrect medication for their needs.

## **Standardised information format: the medicine information box**

The introduction of a requirement that all medicine packaging include a standardised medicine information box would be beneficial in ensuring that consumers have quick and easy access to vital information. It is crucial that this is written in a font that is large enough for people with diminishing sight to read. In addition to the information proposed (active ingredient, uses, warning and allergy information, directions and storage information) this medicine information box should also contain the expiry date clearly.

## **Dispensing label space**

CPSA supports the designated space for dispensing labels on prescription medications. Currently, labels often block important information about the medication, particularly when the

medicines come in small plastic bottles, as is often the case with generic brands, resulting in any information written on the bottle being obscured from view.

### **Blister strip labelling**

CPSA acknowledges that blister packs are often stored away from the original packaging and so adequate detail needs to be provided on the blister packs themselves outlining important information about the medicine. In particular CPSA would like it to be made mandatory that the expiry date is printed in large writing at least once on each blister strip while the brand name, active ingredient and amount, batch number and expiry date in smaller print are repeated every two units as per the proposed changes. Currently, the small, engraved expiry dates on blister packs are often incredibly difficult to decipher, particularly if the package is worn.

### **Small containers**

CPSA supports the proposals put forward for small containers to include the most important information on the packaging and more detailed information in a pack insert. Again however, CPSA would like to see the medical name as the most prominent on the container, ahead of the brand name.

### **Pack inserts**

CPSA supports the proposal that advertising material not be permitted as part of a pack insert.

CPSA also supports the idea that an insert must be separate from the packaging and not be able to be printed on the inside of the box, for example.

It is important that pack inserts are in clear, easy to read language that can be comprehended by people with limited literacy and English language skills. They should also be printed in a size that is legible for most people (at least Arial 14). Presently the print on inserts is much too small for many people, particularly older people, to read.

Where appropriate simple images should be used to portray important information such as dosage size so that it can be easily understood by people with intellectual disabilities. Additionally, the inserts for prescription medications should come in a number of languages so that pharmacists can replace the insert with one in a patient's primary language when required.

CPSA is concerned about the relaying of important medicine information when people are taking multiple medications at once and using Webster packs to manage this. CPSA recommends that it be a requirement that pharmacists provide patients with the pack inserts of every medication in the Webster pack along with a clear description of which pill the information corresponds to, using size, shape and colour to make this easily distinguishable for users.