

## CONSULTATION SUBMISSION COVER SHEET

**This form accompanies a submission on:**

<b>TGA Medicine Labelling and Packaging Review Consultation Paper</b>	
Name and designation:	Mr Geoff Pollard
Company/organisation name and address:	Glaucoma Australia PO Box 420 Crows Nest NSW 1585
Contact phone number:	02 9906 6640
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	I would like the comments I have provided to be kept confidential: <i>(Please give reasons and identify specific sections of response if applicable)</i>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	I would like my name to be removed from all documents prior to publication and not be included within the list of submissions on the TGA website.

**It would help in the analysis of stakeholder comments if you provide the information requested below.**

<b>I am, or I represent, a: (tick all that apply)</b>	
Business in the therapeutics industry (please tick sector):	
<input type="checkbox"/> Prescription Medicines <input type="checkbox"/> Complementary Medicines <input type="checkbox"/> Blood/Tissues	<input type="checkbox"/> OTC Medicines <input type="checkbox"/> Medical Devices <input checked="" type="checkbox"/> Other
<input type="checkbox"/> Sole trader <input type="checkbox"/> Business with employee(s) <input type="checkbox"/> Importer <input type="checkbox"/> Manufacturer <input type="checkbox"/> Supplier <input type="checkbox"/> Industry organisation <input type="checkbox"/> Government <input type="checkbox"/> Researcher <input type="checkbox"/> Professional body <input checked="" type="checkbox"/> Consumer Organisation <input type="checkbox"/> Institution (eg. University, hospital) <input type="checkbox"/> Reg. Affairs Consultant <input type="checkbox"/> Laboratory Professional <input type="checkbox"/> Healthcare Practitioner - please indicate type of practice <input type="checkbox"/> Other (please specify):	

**If you would like to be kept informed on TGA reform consultation activities, please subscribe to the TGA-UPDATE email list via <http://www.tga.gov.au/newsroom/subscribe-tga-consultations.htm>**

Thank you for the opportunity to comment of the proposed changes to labelling and packaging.

As the peak glaucoma patient body, Glaucoma Australia represents the interests of glaucoma sufferers and their families. There remains a strong need for clear labelling and packaging of prescription eye drops.

Regarding Section 7 – Small Containers

Pharmacy labels should not impede a view of the manufacturer details already printed on the bottle or on an existing label. Any label affixed by the dispensing pharmacist should consist of a clear section (that wraps around the bottle) and a white section that hangs from the bottle as a flag would (patient details and instructions to be printed on this section). This will enhance the ability of the patient to understand what they have to do to take the product in the recommended manner.

Packaging likewise should be of a sufficient size and with a clear space to stick a dispensing pharmacist's instruction label. Otherwise the same principle of using a clear/white sectioned label should apply.

A further issue of importance is related to the physical size and composition of small containers, such as eye drop bottles. A certain amount of manual dexterity is ordinarily required to accurately instil a drop into an eye. Patients who use glaucoma medications on at least a daily basis quite often have other age-related co-morbidities (e.g. arthritis, Parkinson's Disease and the like). These make it even more difficult to persist with therapy.

Many eye drop bottles are also made of a rigid material, making it even more difficult to press/squeeze the bottle, hoping to instil an eye drop.

Could consideration be given to the following:

- a minimum bottle size to aid in general handling
- a thinner bottle wall to assist with instillation
- a CMI that informs if the particular manufacturer provides a suitable appliance or not, to assist the patient to instil the drops from the bottle, and how to obtain that appliance.

Thank you,

Geoff Pollard



National Executive Officer

Glaucoma Australia