

Medicines labelling and packaging review

TGA

Submission

24 August 2012

Dear TGA,

Thank you for the opportunity to participate in the medicine labelling and packaging review.

I would like to provide this submission as an interested consumer, even though I work within the pharmaceutical industry.

Prominence of active ingredients on medicine labels

What is the smallest size font that you consider readable?

I would be guided by Vision Australia's Legibility Guidelines.¹ These guidelines recommend a minimum of 12 point up to 18 point for large print.

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

It is good to know there are efforts to minimise the risk of similar sounding brand names, however, using a measurement of "three letters or fewer" as a defining difference between brand names might not be enough. Would the TGA be able to apply other methods described by researchers in this area?²

Also, are design issues being addressed? (eg. colour blind readers, use of suitable contrasting colours.)

Standardised Information Format: the Medicine Information Box

I like the idea of the Medicine Information Box but I am concerned the type size, at no smaller than 1.5 mm (equivalent to approximately 4.5 point in size), would be too small for some consumers.

I would like to suggest the following statement in 18 point size at the bottom of the box or below it:

"Large type information available at www.ebs.tga.gov.au"

The consumer can then access the full Consumer Medicines Information (CMI) leaflet and increase the size of the type until it is readable or potentially use a screen reader to audibly express the content of the CMI. This small addition can make a big difference to consumers who are visually impaired.

Thank you again for the opportunity to contribute.

Yours sincerely,

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References

1. Legibility Guidelines. Vision Australia. <http://www.visionaustralia.org/info.aspx?page=785>
Accessed: 24 August 2012.
2. Lambert BL, Lin SJ, Tan H. Designing safe drug names. *Drug Saf.* 2005;28(6):495-512.