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The Pharmacy Department at the Royal Melbourne Hospital support the comments previously submitted by the Victorian Therapeutic Advisory Group Quality Use of Medicines (vicTAG QUM) group and would also like to put forward these additional comments for consideration

Item   Ref   Comment
LASA packaging and branding 3.1-3.6
We support the addition of a risk assessment for LASA products, however in addition to completing the risk assessment against other trade names, consideration should be given for products where a trade name has a LASA association with a generic medicine name. For example the APOTEX(r) product lines "APO-XXXX" (where XXXX represents the active excipient e.g. APO-alendronate, APO-amlodipine etg) - posed a risk for the morphine product distributed by this company being called "APO-morphine" , given the medicine apomorphine exists.

Dispensing label 5.1-5.2
We strongly support a designated space for a dispensing label which should not include the area occupied by a barcode on a product (which is required to be visible for scanning as part of the dispensing process)
The allocated space should be larger than 70x30mm (Dispensing labels in use within our organisation are 80x38mm)

Blister strip labelling 6.2
We support improvements to labelling on blister strip packaging, particularly 6.2 where a strip can be segmented that the active and amount of active, batch and expiry must appear on each segment. For item 6.1 there should be a strong recommendation that where possible the information is repeated for each dose unit. A minimum size and font should be specified to ensure that the labelling is legible

Other comment N/A
We recommend the development for standard abbreviations on the manufacturer's labels for all slow release formulations (ie instead of differnt synonyms for different brands eg CR/MR/XR/SR/PR/HBS). For example Tramadol uses SR and XR suffix to differentiate the formulations - but this is not a standard definition - so this can cause confusion if people think these products to be interchangeable