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TGA Labelling and Packaging Review  
PO Box 100  
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Email: [labellingreview@tga.gov.au](mailto:labellingreview@tga.gov.au)

24 August 2012

Dear Sir/Madam

**Re: TGA Medicine Labelling and Packaging Review Consultation Paper**

Swisse Vitamins thanks you for the opportunity to provide comment on the government's consultation document 'TGA Medicine Labelling and Packaging Review' ('the Review').

Swisse Vitamins is a market leading, privately owned Australian company, delivering premium quality natural health and wellbeing products to Australians for over 50 years. Swisse Vitamins presently markets 160 SKUs, majority of which are Listed Complementary Medicines.

First and foremost, we would like to register our disappointment with both the consultation process and the consultation paper, particularly in relation to the lack of distinction between the requirements for Prescription, OTC and Complementary Medicines.

Please find below a summary of the key issues. Our full response to all aspects of the Review can be found in Appendix 1.

- Swisse Vitamins' impression of the Review is that it is largely based on the risk profile associated with over the counter and prescription medicines. The extra regulatory requirements for labelling and packaging is considered out of proportion to Listed CM products, of which the TGA has considered to be low risk based on assessment of ingredient safety and manufacturing quality. We strongly believe that the proposed changes will have a negative impact on consumers, retailers and complementary medicine business, for the reasons outlined in this submission. Given the low risk and safety profile of complementary medicines, we believe that the standardization of ingredients on the medicine label will be impractical and unworkable for industry. The Review should be re drafted to include a specific focus on the applicability of the proposed changes to CMs.
- The time allowed for responding to a review of this magnitude was completely inadequate and industry's reasonable request for an extension was declined. There was not enough time for Swisse Vitamins to explore a range of solutions to address the issues identified in the Review and to test the solutions to support an evidence-based approach to regulatory reform.
- There is very little evidence of a risk-based approach to the identification of issues and the formulation of reforms to address those issues. A "one size fits all" approach has been applied to the entire spectrum of medicines. Not only has there been no differentiation drawn between non-prescription and prescription medicines, no attempt



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was made to differentiate between categories within the non-prescription medicines spectrum, i.e. lower risk 'listed' medicines (e.g. sunscreens and complementary medicines) and higher risk 'registered' OTC medicines.

- The regulatory approach adopted in the consultation paper demonstrated no regard for the well-established COAG Principles of Best Practice Regulation. A range of feasible options has not been put forward, no attempt was made to demonstrate that the proposed changes would generate the greatest net benefit for the community and the impact on the brands of non-prescription medicines has not been considered.
- The quality of the consultation paper is also unsatisfactory. The paper is inadequately referenced and contains numerous internal inconsistencies and errors, which made interpretation difficult.
- No evidence was provided that the proposed reforms would achieve the stated objectives of the review. Under the principles of performance or outcomes-based labelling 'best intentions' to construct good labels do not necessarily translate into risk reduction. Until a label has been performance (consumer) tested there is simply no way of knowing whether it will achieve the stated objectives.
- Swisse Vitamins would also like to highlight that the proposed changes involve both increased font sizes and increased levels of content. The natural consequence of these two requirements will be an increase in the physical dimensions of the product label, and therefore packaging. Examples of the significant impact upon Swisse Vitamins labels are provided in Appendix 2

Swisse Vitamins notes however, that we have no issue with the Review itself. Swisse Vitamins supports appropriate options for regulatory reform to change the presentation of information on the labels and packages of medicines that will facilitate to improve the visual presentation of medicines and more importantly improve positive health outcomes for all Australians through their access to and wise use of medicines.

Swisse Vitamins believes that the label is a very important source of information about complementary medicines available to consumers. A well-designed label, one that is easy to read, which enables consumers to readily find essential information, which is intelligible and which translates into safe use, is critical.

Given the magnitude of this Review and its potential impact on industry, Swisse Vitamins feels it is critical to "get it right", i.e. to ensure that the proposed reforms will achieve the stated objectives of the review. A robust evidence-based and cost-effective approach is therefore essential.

All of the proposed changes will result in increased costs to both manufacturers and consumers. The financial impact of any change needs to be thoroughly investigated prior to any implementation.



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Swisse Vitamins thanks you again for the opportunity to make comments on this consultation paper. We look forward to further discussions in the near future.

Regards

Rachel Di Leva  
Head of Regulatory and Science  
Swisse Vitamins



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## APPENDIX 1

# Swisse Vitamins Response to the TGA Medicine Labelling and Packaging Review Consultation Paper

### Issues with the Consultation Paper

Swisse Vitamins' view, the principal deficiencies with the consultation paper are as follows:

#### Content: Inconsistencies and Errors

Swisse Vitamins is concerned that the proposed changes in the consultation paper are not sufficiently clear because the paper itself contains the following errors and inconsistencies with regard to the information provided:

- The consultation paper does not indicate that the labelling requirements for prescription and non-prescription products are currently different, nor does it explain the reasons for the different requirements.
- The consultation paper fails to clearly articulate how (or if) the proposed changes will apply differently to Prescription medicines, OTC medicines and Complementary medicines. This is inconsistent with the TGA's risk-based approach.
- Section 3 includes the erroneous amalgamation of four separate issues (look-alike sound-alike products, different strengths within a prescription medicine brand, umbrella branding and indication specific branding) into a single topic applicable to both prescription and non-prescription products. These four topics ought to be addressed separately because they each represent different sets of risks and they each have varying relevance for prescription and non-prescription products.
- Confusingly, the consultation paper introduces a new term "Look-alike medicine branding" in place of the internationally recognised term "umbrella branding".
- The consultation paper does not define the term "look-alike/sound-alike" which is generally linked to confusion between prescription medicine brand names.
- The term "complementary medicines" is defined differently on pages 6 and 12 and in any event the consultation paper does not properly indicate that complementary medicines can be prescription or non-prescription (as well as being listed or registered).



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Swisse Vitamins also notes that the figures presented throughout the Consultation Paper contain numerous faults, which impair the consultation process. These can be summarised as follows:

- Material is included in the figures, which is not explained in the text. Because these inclusions are not discussed, respondents will be unable to assess and comment on the reasoning for their inclusion. Similarly, respondents will be unable to develop and propose suitable alternatives. Also, we are unable to determine whether or not the apparent changes are intentional or an oversight.
- Figures are included which do not comply with current labelling requirements. In reviewing the label examples provided, Swisse Vitamins notes a number of examples where the current requirements have not been complied with.
- There is a lack of internal consistency within the consultation document. In reviewing the label examples provided, Swisse Vitamins notes a number of examples where there are inconsistencies between the figures themselves and between the figures and the written content of the consultation paper.

Swisse Vitamins notes that these errors make it difficult to assess the basis and/or the merits of the proposed changes, as well as the actual scope of the consultation.

#### Insufficient evidence supporting problem identification and proposed solutions

Swisse Vitamins notes that no attempt was made to appropriately segregate the evidence of risk in relation to prescription and non-prescription medicines. In relation to the TGA's stated "risk-based approach to regulation", the TGA states that:

*"One of the roles of the TGA is to regulate therapeutic products based on an assessment of the evidence of the risks compared to the benefits of the therapeutic products. The TGA does this by applying scientific and clinical expertise."*<sup>1</sup>

Despite this, the Consultation paper proposes uniform solutions across medicines categories. We do not support such a blanket approach.

Furthermore, no evidence was provided that the proposed reforms will achieve the stated objectives of the review. We are unaware of any evidence suggesting that the current labelling requirements for non-prescription products are inadequate or represent a risk to consumers.

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<sup>1</sup> <http://www.tga.gov.au/about/tga-regulatory-framework.htm>



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## **Response to Specific Proposals**

### **Prominence of Active Ingredients on Medicine Labels**

1.1 – The active ingredient(s) must be listed immediately below the brand name, with the first letter of the active ingredient directly below the first letter of the brand name.

Swisse Vitamins does not support this proposal as it would be unworkable for our complementary medicine products to include all active ingredients on the label under the brand name. Consistent with a risk-based approach a distinction should be drawn between the different non-prescription medicines categories. We do not support a blanket approach to be applied to all non-prescription medicines.

The current TGO 69 requirement should be retained which state for particulars to be included on the main label, except:

*3(3) b - where there are two or more active ingredients that are vitamins or minerals or that are required to be quantified as the equivalent fresh or dry weight or volume under sub clauses 4(11)(b) or 4(11)(c) – it shall be sufficient compliance with this sub clause if the names and quantities or portions of these active ingredients together with the names and quantities of every active ingredient in the goods are included on the side panel or side label or on a rear panel or rear label.*

It seems likely that a standardised back-of-pack format for information (“Medicine Box”) will facilitate consumer’s ability to locate and identify the active ingredient and this should be taken into account when considering any changes to the front-of-pack.

1.2 - On the front/main panel of the label, the active ingredient must have equal prominence with the brand name.

Swisse Vitamins does not support this proposal. We believe the current requirements outlined in TGO 69 in regards to listing active ingredients on the main panel are sufficient in communicating the information to consumers. We don’t see any added consumer benefit by enforcing the above proposal for complementary medicine products, in particular with the introduction of the Medicine Information Box or similar options to have consistent, and predictable order of information.

Swisse Vitamins considers that because of the range and complexity of complementary medicine ingredients, it is more useful to have the key benefit of claim prominent of the product label so the consumer can identify if that particular product will assist them. This is especially important considering the complementary medicines industry is in consultation with the TGA on the appropriate evidence required to support indications for listed medicines.

Furthermore, Swisse Vitamins is also concerned about the potential detrimental impact on brand recognition, which is a vital element in consumer product selection.



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1.2.4 – the active ingredient should begin with an uppercase letter but the remainder should be in lower case.

Swisse Vitamins suggests that this would require consideration of the Australian Approved Names (AAN) convention. For example, the TGA AAN is dl-alpha Tocopherol, not DI-alpha tocopherol.

1.3 – Where there are more than 3 active ingredients, the most abundant ingredients must appear on the main label immediately below the brand name and the names, together with the quantities of every active ingredient, are to be included on a side panel/label or on a rear panel/label for the product.

Swisse Vitamins has particular concern with this recommendation. The primary ingredients contributing to the effectiveness of many complementary medicine formulations, may not be the most abundant ingredients by quantity. For example, selenium could be the key ingredient in a men's formula, while folic acid could be the key ingredient in a multivitamin for pregnant women, and a herbal extract could be at therapeutic doses without being one of the most abundant ingredients in the formula due to its concentration ratio and input quantity. Additionally, selenium and folic acid are included in products in microgram amounts, whilst vitamin C is usually in milligram amounts.

As an example, please find attached in Appendix 2, a mocked up label for Swisse Vitamins Ultivite Women's F1 multivitamin product. You will see that although this is a multivitamin product, the three primary ingredients by abundance are three herbal ingredients.

Swisse Vitamins believes therefore that this proposal will cause more confusion and be misleading for consumers giving the impression that the product contains solely those active ingredients mentioned on the front portion of the label. In addition there will be a repetition in active ingredients on the label, when considered across the context of the product, which would also be misleading.

Swisse Vitamins considers the complexity and diversity of complementary medicine ingredients has not been considered and therefore, this proposal is unworkable across all therapeutic goods and could lead to consumers being misled about the benefits of the product.

1.4 – For products containing day and night preparations that have different formulations, the composition of each tablet must be provided immediately below the brand name and the font size must be less than 2mm in height on the main/front panel.

Swisse Vitamins does not support this proposal.

While Swisse Vitamins does not currently have any day and night products on the market, there are a number of complementary medicine products that are designed to include day and night formulations. For example, a day and night menopausal formulation can contain 10 actives in each formula. It would be impractical to include all 20 active ingredients directly underneath the brand name in a font size described above.





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With the introduction of the Medicine Information Box or similar option, we do not see any additional benefits to list all active ingredients on the main panel for low risk complementary medicine products.

1.5 – The active ingredient must be included with, and of equal prominence as, the brand name on at least 3 non-opposing faces of a carton.

Swisse Vitamins does not support the proposal that active ingredients be displayed on 3 non-opposing panels. We believe that the Medicine Information Box or similar is sufficient in communicating information in regards to product formulation in a direct and concise manner. There should be sufficient space left on the main panel to highlight claims and benefits of the product to the consumer.

The example given on Figure 3, page 17 of the Review, outlines this proposal in the context of Registered medicines (AUST R) only. However, the options outlined under the proposed regulatory changes are non-inclusive of complementary medicines. Notwithstanding, for multi ingredient complementary medicine products, such as herbal formulas containing over 4 ingredients, there would be limited space to list the active ingredient with and in equal prominence to the brand name on 3 non-opposing sides of a carton.

Swisse Vitamins strongly encourages the TGA to conduct consumer use testing on sample products covering the prescription, OTC and complementary medicine range to determine the full impact of the proposed changes.

### **Look-alike and Sound-alike Medicine Brand Names and Look-alike Packaging and Branding**

While Swisse Vitamins fully endorses the objective of avoiding possible harm which may result from confusing different medicines, we do not support the blanket and simplistic approach to both prescription and non-prescription medicines advocated in the Review.

Prescription and non-prescription issues and proposals need to be separated. The Consultation paper confusingly amalgamates four interrelated issues into a single topic applicable to both prescription and non-prescription products. The four issues (look-alike sound-alike products; different strengths within a prescription medicine brand; umbrella branding; indication specific branding) all apply differently to prescription and non-prescription medicines.

Consistent with a risk-based approach, proposals should be reflective of the risks posed by the different categories of products (for example, the risks of confusing two prescription products are different to the risks posed by confusing two sunscreens or two complementary medicines).

Given the complexity of these issues (and in view of the above) Swisse Vitamins feels strongly that this area requires more in depth exploration and consultation with all stakeholders to generate confidence that reforms will achieve the stated objectives and not result in unintended consequences.





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3.1 – Sponsors of new medicines would be required to submit evidence of risk assessment of the proposed labelling and packaging. The TGA will work with industry to develop guidance for this assessment, which may include consumer testing or risk assessment checklists similar to those used in other countries. The TGA is investigating methods to electronically screen proposed brand names against already existing brand names to identify potential LASA names.

Swisse Vitamins does not support the proposals outlined for LASA names, as the proposal is overly cautious and will result in reduced speed to market and minimised product opportunities for the complementary medicine industry. Swisse Vitamins also feels that the proposals for regulatory change in this area be written to combat sound-alike medicines for pharmacy medicine only.

The TGA in collaboration with consumers, industry and other stakeholders, should pursue the development of guidelines for LASA and brand extensions (“umbrella branding”). Clear guidelines and protocols would assist both sponsors and the TGA to objectively assess the risks associated with product brands, names and packaging.

Furthermore, risk assessment of labelling and packaging should not be required for listed complementary medicines, as they are considered to be low risk products. If a standard format for a medicines information box is required, this should be more than sufficient to ensure that consumers are well informed for self-selection. Submitting evidence of risk assessment for the proposed labelling and packaging, will slow down the listing process for AUST L products, a process based on the objectives of the Australian National Medicine Policy - of timely access to medicines.

Swisse Vitamins proposes that the TGA commissions a paper on best practices for label comprehension testing.

3.4 – Products that are listed on the ARTG cannot be marketed under the same name as a registered medicine.

Swisse Vitamins does not support this proposal. Generally, consumers are motivated by their individual health concerns and may be unaware of the particular product/ingredient that may be well known for one use is also beneficial for another. Sponsors can simplify this by highlighting the benefits as packaging through sub branding and as the claim or benefit is required to be substantiated at the time of listing, this communication pathway should be retained.

Swisse Vitamins suggest that restricting Sponsors in the way their medicine is to be presented by contrasting colours and designs, would not contribute to consumers or healthcare professionals making safer decisions. Swisse Vitamins reiterate the vital importance of education in industry, in particular consumer education on how to read medicine labels suitably. Swisse Vitamins suggest that by placing all this information in one area of the packaging will assist consumers when making decisions on selecting medicines, than compared to altering the colours and designs of the packaging.

The proposed regulatory options are restrictive and imposing on industry. Especially for those products and brands which are well known particularly for their image and product name and



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hence will be of disadvantage when a requirement such as changing colours and designs are imposed due to information on the label being read incorrectly.

Swisse Vitamins invests heavily in creating a brand image and does not only involve the name of the brand but also the overall presentation. Swisse Vitamins argue that altering colours and designs of the brand name does not justify a solution in assisting consumers to make safer decision when selecting medicines.

### **Standardised Information Format: The Medicine Information Box**

In general Swisse Vitamins is not adverse to the standardization of information on medicine labels, and believes that it may assist consumers make decisions about medicines.

Currently however, a medicine information box (MIB) is not mandatory for labels and packs and it may not always be feasible depending on the size of the label and the size of a complementary medicine product formula. The proposed mandatory information (active ingredient, indications, warnings, allergen, contraindication, and storage) may not always fit onto a single panel of a label or carton and still meet the minimum font size requirement.

Swisse Vitamins strongly suggests that any proposed back-of-pack format should be tested prior to adoption. Provision should also be made for alternative formats to accommodate different product categories or types, subject to consumer testing. The relevance/need for the title “Medicine Information Box” should be consumer tested too, as it may not be relevant to all product categories. Finally, cues on the front-of-pack drawing attention to the panel should be explored and tested

4.1 – Mandatory information on labels and packaging of non-prescription medicines and complementary medicines is presented in a standardized Medicine Information Box, based on the US FDA Drug Facts Box ...

Swisse Vitamins has concerns with regard to the technicality of the above proposal. In regards to allergen information, Sponsors should have the ability to include extra allergen information (such as contains no added gluten) on a pack.

Also, the consultation paper does not go into further detail regarding the inclusion of the tablet appearance despite that this is not currently required under TGO 69. Further clarification is recommended regarding whether the inclusion of tablet appearance is mandatory.

4.2 – the font height for information must be no smaller than 1.5mm, with heading height at least 2mm.

Swisse Vitamins supports the current mandatory requirements for font size of no smaller than 1.5mm in height. However, for Swisse Vitamins’ complementary medicines, the mandatory information prescribed for the MIB cannot physically fit onto one panel of a label. Please see examples attached in Appendix 2.



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Swisse Vitamins acknowledges that label space versus minimum print height is an issue across the industry. However, Swisse Vitamins strongly resists the proposed regulatory option for mandatory pack inserts. Swisse Vitamins packs majority of its products in single containers with single labels. The mandatory requirement for pack inserts would require Swisse Vitamins to include secondary packaging, which would significantly increase costs, and contribute to environmental waste.

The TGA should therefore permit other label solutions (such as peel back concertina labels) without requiring special approvals for alternative solutions.

4.3 – The Medicine Information Box must have a white background with black text. Heading must be highlighted or bolded so they are sufficiently emphasised.

Swisse Vitamins questions whether this would be acceptable for all product labels on the market, considering the variation in colours and styles.

4.4 - Where there is insufficient room on a single face of a package, the box may be split over more than one face. In these instances a pack insert may also be included containing the medicine information box as a continuous table.

Swisse Vitamins notes that the TGA could consider a prescribed sequence of how mandatory information must appear on the label, but without necessarily, a prescribed format such as a Box. This would provide Sponsors with flexibility to present mandatory information in a clear and concise manner without the constraint of a MIB or pack inserts. Such an option should be considered, as it will reduce the financial impacts related to pack inserts.

4.6 – For products containing more than three active ingredients, or products in small containers, there may be insufficient space on the medicine container or primary packaging for a complete Medicine Information Box. In these cases a complete MIB should be included as a pack insert. The minimum information to be included on the label will include Directions, and Warnings and Allergy Information.

As previously stated, Swisse Vitamins strongly resists the proposed regulatory option for mandatory pack inserts. Swisse Vitamins packs majority of its products in single containers with single labels. The mandatory requirement for pack inserts would require Swisse Vitamins to include secondary packaging, which would significantly increase costs, and contribute to environmental waste.

Furthermore, Swisse Vitamins considers that directions, warnings and allergen information to be important but not sufficient on their own to allow consumers to make sound purchasing decisions without access to other important information, particularly where the products are for self selection by consumers.



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### **Dispensing Label Space**

This item has been identified as applying to prescription medicines only. Swisse Vitamins therefore has no comment in relation to this part of the Review.

### **Blister Strip Labelling**

6.1 – The brand name of the medicine, the active ingredient and the amount of active ingredient, batch number and expiry date must be repeated at least once every two units.

Swisse Vitamins rejects the proposal to include the batch and expiry data more frequently on the blister strip than currently required. The identified risk is that blister strips stored away from the packaging will not contain information about how to use the medicine safely. However, the proposed repetition of the batch and expiry data will not provide this information and will therefore have no impact on the quality use of medicine. The proposed change does nothing to address the identified risk and therefore cannot be justified.

More frequent inclusion of the batch and expiry data on the blister strips will have far-reaching consequences throughout the manufacturing and supply chain and will result in substantial increases in costs.

Swisse Vitamins suggests that non-regulatory approaches to mitigate risks e.g. consumer education on the risks of removing blisters from their packaging, be considered instead.

6.4 – Where there are more than 3 ingredients, for example multi-vitamins packaged this way, it may be sufficient to include a single list of active ingredients printed on the foil of each blister strip. Alternatively, the brand name, together with batch number and expiry date, should be repeated on the foil.

Swisse Vitamins supports the inclusion of brand name, active ingredients and its quantities to be repeated on the blister strip as many times as practical for formulas containing not more than three active ingredients, and at least once for formulas containing more than three ingredients. Furthermore, Swisse Vitamins recommends that batch number and expiry date should be included once on each blister strip.

### **Small containers**

The consultation paper appears to re-state existing requirements for non-prescription medicines and it should be clarified how the “proposed changes” differ from the current arrangements. Swisse Vitamins agrees with the comments about the practical considerations and challenges in relation to small containers.

Given the practical limitations of small containers, the impact of the proposed changes in their entirety need to be examined in detail. For example, the inclusion for the “Medicines Information Box” headings alone will have a significant impact.



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## Pack Inserts

8.1 – Advertising material will not be permitted to be included as a separate pack insert or incorporated into an approved pack insert

It is unclear as to why this regulatory change has been proposed and how this change will improve the safe and effective use of medicines.

Pack inserts offer sponsors of complementary medicines an opportunity to provide consumers with suggestions for other products, which are related to the medicine that they have purchased and may benefit from. It is acceptable to prohibit the advertisement of prescription medicines on pack inserts because advertisements of these medicines are prohibited under the Therapeutic Goods Advertising Code (TGAC), however such restrictions do not apply to complementary medicines and as such this regulatory proposal should exclude complementary medicines.

Swisse Vitamins notes that no definition for ‘advertising material’ is provided for throughout the consultation document. It would be helpful if the definition were to be included in the document under the glossary.

Advertisements for therapeutic goods in Australia are subject to the requirements of the *Therapeutic Goods Act 1989* (the Act) and *Therapeutic Goods Regulations 1990* (the Regulations), the *Competition and Consumer Act 2010* and other relevant laws. Advertisements for therapeutic goods directed to consumers must also comply with the *Therapeutic Goods Advertising Code* (TGAC), as amended from time to time.

The purpose of these requirements is to protect public health by promoting the safe use of therapeutic goods, ensuring that they are honestly promoted as to their benefits, uses and effects. Through a series of co regulatory and self regulatory arrangements, advertising of therapeutic goods is to be conducted in a manner that promotes the quality use of the product, is socially responsible and does not mislead or deceive the consumer.

The Sponsor therefore, should have the ability to communicate how the product works (in addition to technical jargon that are usually used in indications) via product packaging to consumers. This is especially the case for listed complementary medicines, which are available for self-selection by consumers.

8.2 - A pack insert must be in a form separate to the packaging; i.e. it cannot be printed on the inside of the carton.

Swisse Vitamins supports the above proposal by definition, in that for those products that include a pack insert, it should be in a form separate to the packaging and not printed on the inside of the carton.



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### **Labels and Packaging Advisory Committee**

9 - It is proposed that this expert advisory body will provide advice to the TGA on product – specific as well as general matters relating to medicine labels and packaging.

Swisse Vitamins appreciates the value of an appropriately constituted Committee in objectively applying clear guidelines and protocols to expedite evidence-based decision making in relation to medicines labelling and packaging.

Swisse Vitamins therefore supports the idea of having a ‘labels and packaging advisory committee’, so long as the details of the terms of reference for that committee are addressed and agreed to in consultation with industry.



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## **Additional Comments**

### **Transition Period**

It is proposed that a three year transitional period for existing products will be permitted after the proposal is a registered legislative instrument in mid 2013.

Swisse Vitamins highlights the extent of regulatory reform for complementary medicines and in particular to consider aligning transition timeframes with other large reform projects such as the coded indications project and evidence required to support listed indications. Such consideration would allow for a more efficient transition for industry with regard to these costly and substantial changes.

### **Overall Packaging Design**

Overall, the packaging design proposed is likely to result in reduced competitiveness in the market place for complementary medicine products. Every product will look almost identical except for the color and design used on the main panel with all the other information in black and white.

The proposal could also have a significant impact on overseas customers who take common packaging sold in Australia, resulting in trade barriers because it is usually too expensive to have market-specific packaging for 'less' regulated countries and or smaller volume/value markets.

Swisse Vitamins  
August 2012





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## APPENDIX 2

# Product Label Mock Ups

#### Swisse Vitamins Pty Ltd

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**CLED – Celebrate Life Every Day**  
Swisse is a carbon balanced company

## SWISSE WOMEN'S ULTIVITE - CURRENT LABEL

<p><b>FREECALL 1800 SWISSE</b> <a href="http://www.swisse.com">www.swisse.com</a></p>	
<p><b>EACH TABLET CONTAINS:</b> Betacarotene 5 mg; Vitamin D3 200 IU (cholecalciferol 5 mcg); Vitamin E 50IU (d-alpha-tocopheryl acid succinate 41.33 mg); Vitamin B1 (thiamine hydrochloride) 50 mg; Vitamin B2 (riboflavin 50 mg); Nicotinamide 50 mg; Vitamin B5 (pantothenic acid 68.7 mg from calcium pantothenate 75 mg); Vitamin B6 (pyridoxine 41.14 mg from pyridoxine hydrochloride 50 mg); Vitamin B12 (cyanocobalamin 50 mcg); Biotin 50 mcg; Folic acid 500 mcg; Vitamin C (ascorbic acid 165.2 mg from calcium ascorbate dihydrate 200 mg); Choline bitartrate 25 mg; Inositol 25 mg; Citrus bioflavonoids extract 40 mg; Lysine hydrochloride 50 mg; Calcium 42 mg (calcium citrate 200 mg); Magnesium 47.16 mg (magnesium oxide 81.46 mg); Potassium 2 mg (potassium sulfate 4.45 mg); Iron 4.9 mg (ferrous fumarate 16.01 mg); Chromium 6.2 mcg (chromium picolinate 16 mg); Manganese 1.6 mg (manganese amino acid chelate 16 mg); Copper 58 mcg (copper gluconate 417 mcg); Iodine 50.46 mcg (potassium iodide 66 mcg); Zinc 50 mg (zinc amino acid chelate 25 mg); Selenium 26 mcg (selenomethionine 65 mcg); Co-enzyme Q10 (ubidecarenone 1 mg); Spermacet oil 1.5 mg; Papaya 10 mg (Carica papaya fruit powder); Parsley 10 mg (Petroselinum crispum herb powder); Lutein 200 mcg <b>EXTRACTS EQUIVALENT TO DRY:</b> Fennel 15 mg (Foeniculum vulgare fruit); Horsetail 30 mg (Equisetum arvense herb); Celery 20 mg (Apium graveolens seed);</p>	<p>Ginger 15 mg (Zingiber officinale root); Astragalus 50 mg (Astragalus membranaceus root); Gotu kola 10 mg (Centella asiatica herb); Hawthorn 30 mg (Crataegus monogyna fruit); Chamomile 15 mg (Matricaria recutita flower); Licorice 10 mg (Glycyrrhiza glabra root &amp; stolon); Bearberry 25 mg (Arctostaphylos uva-ursi leaf); Siberian ginseng 25 mg (Eleutherococcus senticosus root) <b>EXTRACTS EQUIVALENT TO FRESH:</b> Oats 500 mg (Avena sativa herb); Globe artichoke 50 mg (Cynara scolymus leaf) <b>STANDARDISED EXTRACTS EQUIVALENT TO:</b> Grape seed 1.0 g (Vitis vinifera seed dry); St. Mary's thistle 50 mg (Ginkgo biloba fruit dry); St. Mary's thistle 50 mg (Ginkgo biloba leaf dry); Bilberry 25 mg (Vaccinium myrtillus leaf fresh); Green tea 20 mg (Camellia sinensis leaf dry); Tomato 750 mg (Lycopersicon esculentum fruit fresh)</p> <p><b>Swisse Vitamins Pty Ltd</b> 36-38 Gipps St, Collingwood VIC Australia 3066 FREECALL 1800 794 773 <a href="http://www.swisse.com">www.swisse.com</a></p> <p>Store below 30°C. Do not use if cap seal is broken.</p> <p><b>Made in Australia</b></p> <p>Batch No.</p> <p>Use by</p>
<p><b>WOMEN'S ULTIMATE<sup>®</sup></b> MULTIVITAMIN MINERAL &amp; ANTIOXIDANT WITH HERBS <b>FORMULA 1</b></p> <p><b>Clinically Tested</b> <b>Based on 25+ Years Research</b></p> <p><b>60 TABLETS 2 MONTH SUPPLY</b></p> <p><b>AUST L 187110</b></p>	
<p><b>WARNINGS:</b> Vitamin supplements should not replace a balanced diet. Not for the treatment of iron deficiency conditions. This product contains selenium, which is toxic in high doses. A daily dose of 150 micrograms for adults of selenium from dietary supplements should not be exceeded. If symptoms persist, consult your healthcare practitioner. Do not exceed the stated dose except on medical advice. If you have had a baby with a neural tube defect/spina bifida, seek specific medical advice. Do not take while on warfarin therapy without medical advice. The recommended dose of this medicine provides small amounts of caffeine. Contains lactose. Contains gluten from common oats. <b>No added</b> egg, yeast, salt, preservatives, artificial colours and flavours.</p> <p><b>DIRECTIONS FOR USE - ADULT DOSAGE:</b> One tablet daily, during or immediately after a meal, or as directed by a healthcare professional.</p> <p><b>BENEFITS:</b> Swisse Women's Ultimate Formula 1 contains 50 premium quality vitamins, minerals, antioxidants and herbs to help support women's nutritional needs and maintain general wellbeing. This formula assists with energy production, stamina and helps support a healthy nervous system. The Swisse Ultimate range is based on over 25 years research.</p>	
<p><b>SWISSE IS A CARBON BALANCED COMPANY. PLEASE RECYCLE.</b></p>	

Version No	20
Date last mod	4/5/2012
Size	67x159mm
Designer	Alison Whitehead
Product Code	WUT4/12/60

TYPE SIZES	
Front claim	COMPLIANT
Left body copy	1.5mm/5.8pt
Right body copy	1.5mm/5.8pt

Version No	5 TGA mockup
Date last mod	16/8/2012
Size	103x249mm
Designer	Alison Whitehead

# Schema für Hülseinrezeichnung

## Hülsemdimension

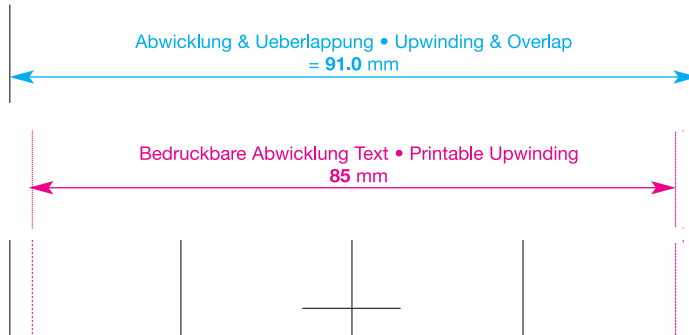
Format: 29.1 Ø (90) x 143.5 Röhre: **R\_230 AWG**

# Pattern for Tubelayout

## Tubedimension

Format: 29.1 Ø (90) x 143.5 Tube: **R\_230 AWG**

### SWISSE ULTIVITE ENERGY EFFERVESCENT - CURRENT LABEL



Version No	10
Date last mod	24/2/2012
Designer	Alison Whitehead



#### PMS COLOURS USED

- PMS 1795C
- PMS 871C
- PMS 1205C
- PMS 109C

Bedruckbare Fläche Text und / oder Illustrationen, Bilder.  
Printable area text and / or illustration, picture.

Abstand links 3mm  
Distance left 3mm

Abstand rechts 1mm  
distance on the right 1mm

Übergriff  
Overlap 1mm

Röhrchen  
Tube

Fläche Röhrchen  
body of the tube

#### Legende

- AWG Außenwulst mit Garantievverschluss  
Bulge with warranty catch
- SW Sonderwulst  
Spezial bulge with warranty catch
- KS Kindersicher  
Safety device for children

# Schema für Hülseinreinzeichnung

## Hülsendimension

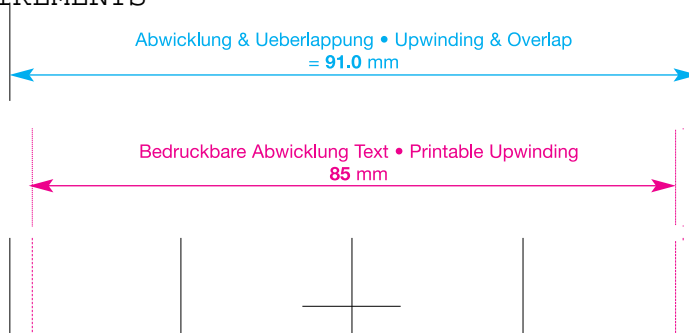
# Pattern for Tubelayout

## Tubedimension

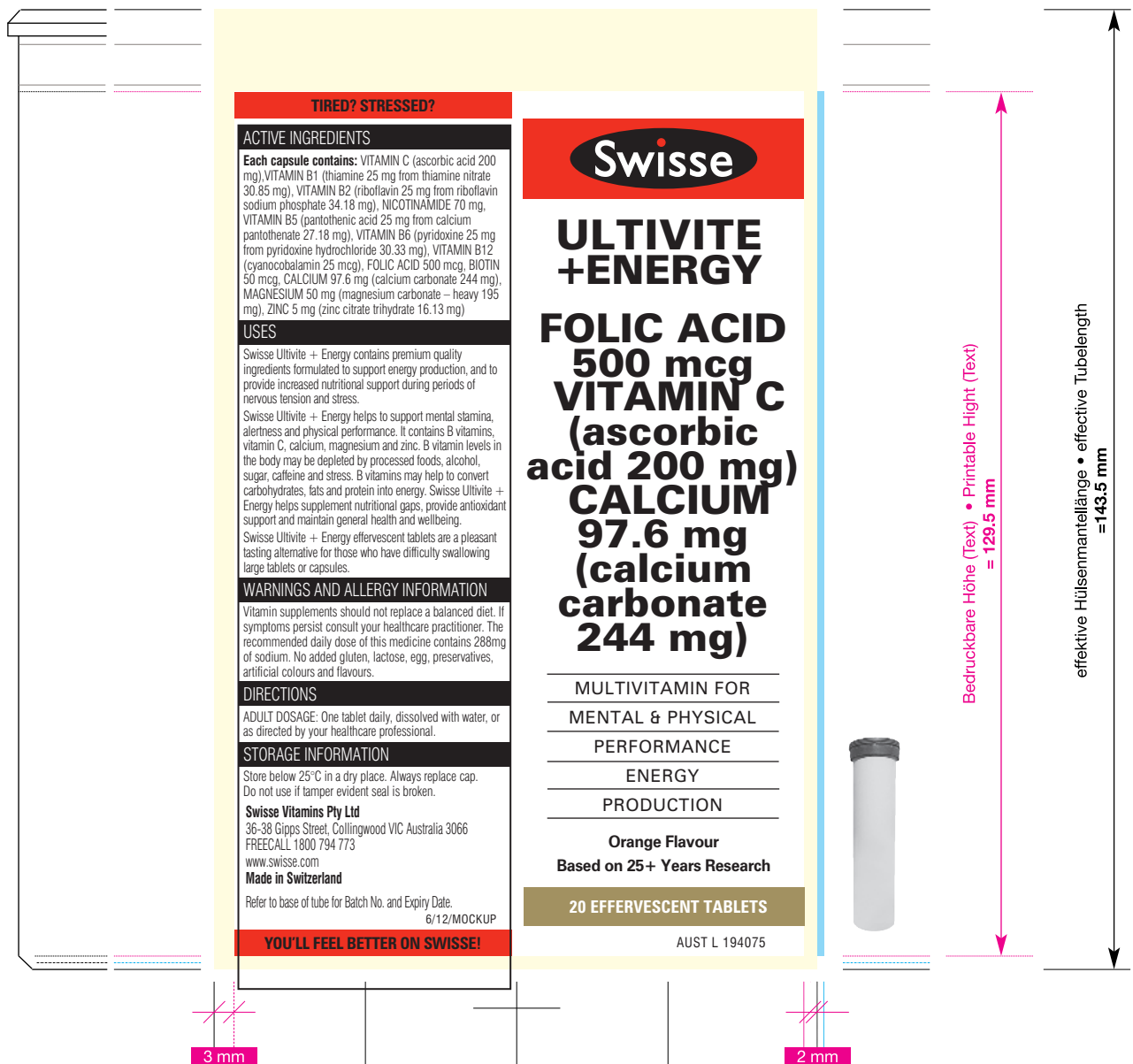
Format: 29.1 Ø (90) x 143.5 Röhre: **R\_230 AWG**

Format: 29.1 Ø (90) x 143.5 Tube: **R\_230 AWG**

SWISSE ULTIVITE ENERGY EFFERVESCENT – MOCKED UP TO PROPOSED TGA REQUIREMENTS



Version No	10
Date last mod	24/2/2012
Designer	Alison Whitehead



### PMS COLOURS USED

<span style="display:inline-block; width:10px; height:10px; background-color:#E67E22; border:1px solid black;"></span>	PMS 1795C
<span style="display:inline-block; width:10px; height:10px; background-color:#8B4513; border:1px solid black;"></span>	PMS 871C
<span style="display:inline-block; width:10px; height:10px; background-color:#F1C40F; border:1px solid black;"></span>	PMS 1205C
<span style="display:inline-block; width:10px; height:10px; background-color:#F1C40F; border:1px solid black;"></span>	PMS 109C

Bedruckbare Fläche Text und / oder Illustrationen, Bilder.  
Printable area text and / or illustration, picture.

Abstand links 3mm  
Distance left 3mm

Abstand rechts 1mm  
distance on the right 1mm

Übergriff  
Overlap 1mm 1mm

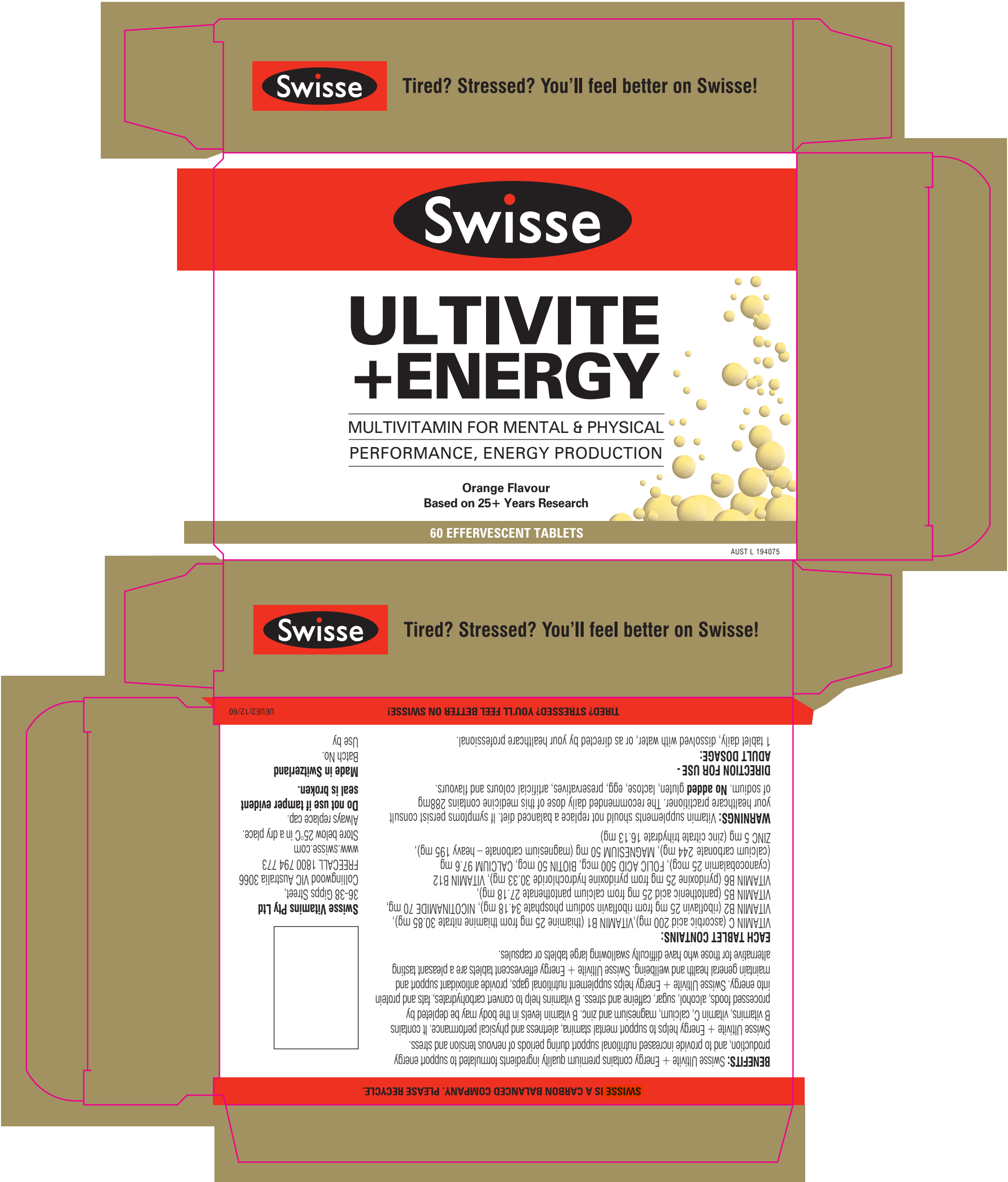
Röhrchen  
Tube

Fläche Röhrchen  
body of the tube

### Legende

- AWG Außenwulst mit Garantievverschluss  
Bulge with warranty catch
- SW Sonderwulst  
Spezial bulge with warranty catch
- KS Kindersicher  
Safety device for children

Version No	9
Date last mod	24/2/2012
Designer	Alison Whitehead



PMS COLOURS USED

- PMS 1795C
- PMS 871C
- PMS 1205C
- PMS 109C

Version No	MOCKUP
Date last mod	23/7/2012
Designer	Alison Whitehead



PMS COLOURS USED

- PMS 1795C
- PMS 871C
- PMS 1205C
- PMS 109C



SWISSE PROFESSIONAL LIVER DETOX + CLEANSE - CURRENT LABEL

**BENEFITS:** Swisse Professional Liver Detox + Cleanse is a unique combination of premium quality herbs used in Traditional Chinese and Western Herbal Medicine to assist liver health. This combination of herbs may help protect healthy liver function. Swisse Professional Liver Detox + Cleanse contains St. Mary's thistle, which has an antioxidant action and may help protect against potential free radical damage. The formula also includes bupleurum and turmeric, traditionally used for their anti-inflammatory properties. Dandelion is included as it may be helpful in the management of constipation, alongside a healthy diet and lifestyle. Swisse Professional Liver Detox + Cleanse contains pleasant tasting, antioxidant-rich pomegranate juice concentrate. Swisse Professional liquids involve minimal processing and truly reflect the chemical characteristics of the original herb in a convenient and pleasant tasting liquid. Store below 30°C. Avoid storage in direct sunlight or heat. Do not use if cap seal is broken.


**Swisse Vitamins Pty Ltd**  
36-38 Gipps Street, Collingwood VIC Australia 3066  
FREECALL 1800 794 773  
www.swisse.com

**Made in Australia**

Batch No.


Use by

Swisse is a carbon balanced company. Please recycle.



## LIVER DETOX + CLEANSE

SUPPORTS LIVER HEALTH & DETOXIFICATION  
ANTIOXIDANT SUPPORT



200 mL Oral Liquid

AUST L 194089

**INGREDIENTS**  
**PER 7.5 mL:**  
DANDELION ROOT (Taraxacum officinale root dry equiv. 750 mg)  
BUPLEURUM (Bupleurum falcatum root dry equiv. 937.5 mg)  
ST. MARY'S THISTLE (Silybum marianum seed dry equiv. 2.25 g)  
TURMERIC (Curcuma longa rhizome dry equiv. 375 mg)  
DAN SHEN (Salvia miltiorrhiza root dry equiv. 187.5 mg)  
POMEGRANATE (Punica granatum fruit juice fresh equiv. 3.75 g)

**WARNINGS:** Contains ethanol. If symptoms persist, consult your healthcare practitioner. Products containing xylitol may have a laxative effect or cause diarrhoea. Drink plenty of water.  
**No added** gluten, lactose, egg, salt, preservatives, artificial colours and flavours. Suitable for vegans and vegetarians.

**DIRECTIONS FOR USE – ADULT DOSAGE:**  
7.5ml diluted in water, twice daily, with food, or as directed by a healthcare professional.

PLDC6/12/200

Version No	13
Date last mod	14/6/2012
Size	65x165mm
Designer	Alison Whitehead
TYPE SIZES	
Front claim	COMPLIANT
Left body copy	COMPLIANT
Right body copy	COMPLIANT

SWISSE PROFESSIONAL LIVER DETOX + CLEANSE - MOCKED TO PROPOSED TGA REQUIREMENTS

MEDICINES INFORMATION BOX

ACTIVE INGREDIENTS

Each 7.5 mL contains: DANDELION ROOT (Taraxacum officinale root dry equiv. 750 mg), BUPLEURUM (Bupleurum falcatum root dry equiv. 937.5 mg), ST. MARY'S THISTLE (Silybum marianum seed dry equiv. 2.25 g), TURMERIC (Curcuma longa rhizome dry equiv. 375 mg), DAN SHEN (Salvia miltiorrhiza root dry equiv. 187.5 mg), POMEGRANATE (Punica granatum fruit juice fresh equiv. 3.75 g)

USES

Swisse Professional Liver Detox + Cleanse is a unique combination of premium quality herbs used in Traditional Chinese and Western Herbal Medicine to assist liver health. This combination of herbs may help protect healthy liver function.

Swisse Professional Liver Detox + Cleanse contains St. Mary's thistle, which has an antioxidant action and may help protect against potential free radical damage. The formula also includes bupleurum and turmeric, traditionally used for their anti-inflammatory properties. Dandelion is included as it may be helpful in the management of constipation, alongside a healthy diet and lifestyle.

Swisse Professional Liver Detox + Cleanse contains pleasant tasting, antioxidant-rich pomegranate juice concentrate.

Swisse Professional liquids involve minimal processing and truly reflect the chemical characteristics of the original herb in a convenient and pleasant tasting liquid.



LIVER DETOX + CLEANSE

POMEGRANATE (Punica granatum fruit juice fresh equiv. 3.75 g)

ST. MARY'S THISTLE (Silybum marianum seed dry equiv. 2.25 g)

BUPLEURUM (Bupleurum falcatum root dry equiv. 937.5 mg)

SUPPORTS LIVER HEALTH & DETOXIFICATION

ANTIOXIDANT SUPPORT

200 mL Oral Liquid



AUST L 194089

WARNINGS AND ALLERGY INFORMATION

Contains ethanol. If symptoms persist, consult your healthcare practitioner. Products containing xylitol may have a laxative effect or cause diarrhoea. Drink plenty of water.

No added gluten, lactose, egg, salt, preservatives, artificial colours and flavours. Suitable for vegans and vegetarians.

DIRECTIONS

ADULT DOSAGE: 7.5ml diluted in water, twice daily, with food, or as directed by a healthcare professional.

STORAGE INFORMATION

Store below 30°C. Avoid storage in direct sunlight or heat. Do not use if cap seal is broken.

Swisse Vitamins Pty Ltd

36-38 Gipps Street, Collingwood VIC Australia 3066

FREECALL 1800 794 773

www.swisse.com

Made in Australia

Batch No.

Use by



Swisse is a carbon balanced company. Please recycle.

PLDC6/12/MOCKUP

Version No	4 TGA mockup
Date last mod	16/8/2012
Size	95x255mm
Designer	Alison Whitehead
TYPE SIZES	
Front claim	COMPLIANT
Left body copy	COMPLIANT
Right body copy	COMPLIANT

## APPENDIX 2 - LABEL MOCK UPS

**BENEFITS:** Swisse Professional Yeast Care is a premium quality herbal and nutritional formula that provides support in the maintenance of normal intestinal *Candida albicans* levels, helps to restore microflora balance and supports the integrity of the digestive lining.

The therapeutic properties of this formula can be attributed to golden seal, Pau D'arco, Oregon grape and calendula, which have traditionally been used to support the immune system. It also contains biotin to help supplement any loss of natural biotin production due to microflora imbalance.

The combination of herbs in Swisse Professional Yeast Care have been used traditionally to help the body combat fungal and other microbial infections.

Store below 30°C.

**Swisse Vitamins Pty Ltd**  
36-38 Gipps Street, Collingwood  
VIC Australia 3066  
FREECALL 1800 794 773  
www.swisse.com

**Made in Australia**

Batch No.  
Use by

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# YEAST CARE

PAU D'ARCO, GOLDEN SEAL,  
OREGON GRAPE & CALENDULA  
RESTORES MICROFLORA BALANCE  
IMMUNE SUPPORT

30 TABLETS

### EACH TABLET CONTAINS:

PAU D'ARCO  
(*Tabebuia avellanedae* equiv. 833.32 mg stem bark inner dry)  
GOLDEN SEAL  
(*Hydrastis canadensis* equiv. 333.32 mg root dry)  
OREGON GRAPE (*Berberis aquifolium* equiv. 600 mg root dry)  
CALENDULA (*Calendula officinalis* equiv. 1 g flower dry)  
ZINC 3.33mg (Zinc amino acid chelate 16.67 mg)  
BIOTIN 33.33 mcg

**WARNINGS:** If symptoms persist consult your healthcare practitioner. Vitamin supplements should not replace a balanced diet.

**No added** gluten, lactose, egg, yeast, salt, preservatives, artificial colours and flavours. Suitable for vegetarians.

**DIRECTIONS FOR USE – ADULT DOSAGE:** One tablet, three times daily with food, or as directed by a healthcare professional.

AUST L 182095

PYC10/11/30

## SWISSE PROFESSIONAL YEAST CARE – CURRENT LABEL

Version No	7
Date last mod	26/10/2011
Size	63x153mm
Designer	BCreative Studio

SWISSE PROFESSIONAL YEAST CARE - MOCKED UP TO PROPOSED TGA REQUIREMENTS

MEDICINES INFORMATION BOX

ACTIVE INGREDIENTS

Each tablet contains: PAU D'ARCO (Tabebuia avellanedae equiv. 833.32 mg stem bark inner dry), GOLDEN SEAL (Hydrastis canadensis equiv. 333.32 mg root dry), OREGON GRAPE (Berberis aquifolium equiv. 600 mg root dry), CALENDULA (Calendula officinalis equiv. 1 g flower dry), ZINC 3.33mg (Zinc amino acid chelate 16.67 mg) BIOTIN 33.33 mcg

premium quality herbal and nutritional formula that provides support in the maintenance of normal intestinal Candida albicans levels, helps to restore microflora balance and supports the integrity of the digestive lining.

The therapeutic properties of this formula can be attributed to golden seal, Pau D'arco, Oregon grape and calendula, which have traditionally been used to support the immune system. It also contains biotin to help supplement any loss of natural biotin production due to microflora imbalance.

The combination of herbs in Swisse Professional Yeast Care have been used traditionally to help the body combat fungal and other microbial infections.

Swisse

PROFESSIONAL

YEAST CARE

CALENDULA (Calendula officinalis equiv. 1 g flower dry)

PAU D'ARCO (Tabebuia avellanedae equiv.833.32 mg stem bark inner dry)

OREGON GRAPE (Berberis aquifolium equiv. 600 mg root dry)

RESTORES MICROFLORA BALANCE

IMMUNE SUPPORT

30 TABLETS

AUST L 182095

WARNINGS AND ALLERGY INFORMATION

If symptoms persist consult your healthcare practitioner. Vitamin supplements should not replace a balanced diet. No added gluten, lactose, egg, yeast, salt, preservatives, artificial colours and flavours. Suitable for vegetarians.

DIRECTIONS

ADULT DOSAGE: One tablet, three times daily with food, or as directed by a healthcare professional.

STORAGE INFORMATION

Store below 30°C. Do not use if cap seal is broken.

Swisse Vitamins Pty Ltd

36-38 Gipps Street, Collingwood VIC Australia 3066

FREECALL 1800 794 773

www.swisse.com

Made in Australia

Batch No.

Use by

Version No	3 TGA mockup
Date last mod	13/8/2012
Size	113x268mm
Designer	Alison Whitehead

SWISSE ULTIBOOST VALCIUM + VITAMIN D - CURRENT LABEL

**FREECALL 1800 SWISSE** [www.swisse.com](http://www.swisse.com)

**BENEFITS:** Swisse Ultiboost Calcium + Vitamin D contains premium quality ingredients to help support healthy bones and teeth. Swisse Ultiboost Calcium + Vitamin D contains a premium form of calcium (citrate) and natural vitamin D3 for increased calcium absorption. It also contains Bioperine, a unique standardised extract of black pepper.

The human skeleton consists of 206 bones that provide a framework for the body to help maintain shape, protect vital organs and provide a place for muscles and supporting structures to attach. Bones also function as a site for mineral storage and blood cell formation.

Calcium requirements increase with age, gender, post menopause, diet, pregnancy and lactation. Swisse Ultiboost Calcium + Vitamin D helps to address dietary calcium deficiency and may provide support for osteoporosis.

**Swisse Vitamins Pty Ltd**  
36-38 Gipps Street, Collingwood  
VIC Australia 3006  
FREECALL 1800 794 773  
[www.swisse.com](http://www.swisse.com)  
Store below 30°C.

**Made in Australia**  
Batch No.  
Use by

**ULTIBOOST®**

**Swisse®**

**CALCIUM + VITAMIN D**

HELPS SUPPORT

HEALTHY BONES & TEETH

CALCIUM CITRATE & VITAMIN D3

SWISSE ARE PROUD SUPPORTERS OF

**oa**  
osteoporosis australia

**90 TABLETS**

**TIRED? STRESSED?**

**EACH TABLET CONTAINS:**  
CALCIUM 333.33 mg (Calcium citrate 1.58 g)  
VITAMIN D3 333IU (Cholecalciferol 8.3 mcg)  
BIOPERINE – BLACK PEPPER (Piper nigrum standardised extract equiv. to fruit dry 29.75 mg, Piperine 1.67 mg)

**WARNINGS:** If symptoms persist consult your healthcare professional. Vitamin supplements should not replace a balanced diet. **No added** gluten, lactose, egg, yeast, salt, soy, artificial colours and flavours.  
Suitable for vegetarians.

**DIRECTIONS FOR USE – ADULT DOSAGE:**  
Two-three tablets daily, during or immediately after a meal, or as directed by a healthcare professional.

**SWISSE IS A CARBON BALANCED COMPANY. PLEASE RECYCLE.**

AUST L 188495

**YOU'LL FEEL BETTER ON SWISSE!®** UCD8/11/90

Version No	8
Date last mod	25/8/2011
Size	80x190mm
Designer	Alison Whitehead

FREECALL 1800 SWISSE [www.swisse.com](http://www.swisse.com)

## MEDICINES INFORMATION BOX

## ACTIVE INGREDIENTS

Each tablet contains: CALCIUM 333.33 mg (Calcium citrate 1.58 g) VITAMIN D3 333IU (Cholecalciferol 8.3 mcg)

## USES

Swisse Ultiboost Calcium + Vitamin D contains premium quality ingredients to help support healthy bones and teeth. Swisse Ultiboost Calcium + Vitamin D contains a premium form of calcium (citrate) and natural vitamin D3 for increased calcium absorption.

The human skeleton consists of 206 bones that provide a framework for the body to help maintain shape, protect vital organs and provide a place for muscles to attach.

Calcium requirements increase with age, gender, post menopause, diet, pregnancy and lactation. Swisse Ultiboost Calcium + Vitamin D helps to address dietary calcium deficiency, a diet deficient in calcium may contribute to osteoporosis in later life.

SWISSE ARE PROUD SUPPORTERS OF



osteoporosis australia

SWISSE IS A CARBON BALANCED COMPANY. PLEASE RECYCLE.

ULTIBOOST®

# CALCIUMs + VITAMIN D

## CALCIUM 333.33 mg (Calcium citrate 1.58 g) VITAMIN D3 333IU (Cholecalciferol 8.3 mcg)

HELPS SUPPORT HEALTHY BONES &amp; TEETH CALCIUM CITRATE &amp; VITAMIN D3

90 TABLETS

## WARNINGS AND ALLERGY INFORMATION

If symptoms persist consult your healthcare professional. Vitamin supplements should not replace a balanced diet. No added gluten, lactose, egg, yeast, salt, soy, artificial colours and flavours. Suitable for vegetarians.

## DIRECTIONS

ADULT DOSAGE: Two-three tablets daily, during or immediately after a meal, or as directed by a healthcare professional.

## STORAGE INFORMATION

Store below 30°C. Do not use if cap seal is broken.

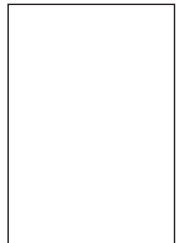
## Swisse Vitamins Pty Ltd

36-38 Gipps Street, Collingwood  
VIC Australia 3066  
FREECALL 1800 794 773  
[www.swisse.com](http://www.swisse.com)

## Made in Australia

Batch No.

Use by



6/12/MOCKUP

Version No	3 TGA mockup
Date last mod	16/8/2012
Size	85x250mm
Designer	Alison Whitehead

SWISSE ULTIBOOST CALCIUM + VITAMIN D - MOCKED UP TO PROPOSED TGA REQUIREMENTS

SWISSE ULTIBOOST HAIR SKIN NAILS - CURRENT LABEL

FREECALL 1800 SWISSE    www.swisse.com

INGREDIENTS

PER 10mL:

SILICA-COLLOIDAL ANHYDROUS 350 mg (silicon 164 mg)

BLOOD ORANGE EXTRACT (Citrus sinensis standardised extract equiv. to fruit pericarp fresh 18 g)

VITAMIN C (ascorbic acid 200 mg)

Store below 30°C.

Shake well before use.    Refrigerate after opening.

Swisse Vitamins Pty Ltd

36-38 Gipps Street, Collingwood

VIC Australia 3066

FREECALL 1800 794 773

www.swisse.com

Made in Australia

Batch No.

Use by

SWISSE IS A CARBON BALANCED COMPANY. PLEASE RECYCLE.

ULTIBOOST®

Swisse®

HAIR SKIN NAILS

SILICA & BLOOD ORANGE

SUPPORTS PRODUCTION

OF COLLAGEN

& MAINTAINS HEALTHY

HAIR SKIN & NAILS

Blood Orange Flavour

Based on 25+ Years Research

500 mL Oral Liquid

AUST L 179202

TIRED? STRESSED?

WARNINGS:

If symptoms persist consult your healthcare professional. Vitamin supplements should not replace a balanced diet. Contains sodium benzoate. **No added** gluten, lactose, egg, yeast, salt, artificial colours and flavours.

DIRECTIONS FOR USE – ADULT DOSAGE:

10 mL daily, during or immediately after a meal. Can be taken straight or diluted in water or juice.

BENEFITS:

Swisse Ultiboost Hair Skin Nails liquid is a comprehensive formula containing premium quality ingredients to support the production of collagen and provide essential nutrients for healthy hair, skin and nails. This unique great tasting beauty formula contains silica and vitamin C to support the building blocks of hair, skin and nails and maintain their health and appearance. Blood orange extract is also included for its antioxidant properties. Silica is part of the mineral matrix that supports collagen structure. Collagen is a major structural protein for healthy and strong connective tissue, blood vessels, tendons and ligaments and helps maintain skin integrity and appearance. Vitamin C assists with collagen production and provides antioxidants to protect cells from potential free radical damage. The blood orange extract included in Swisse Ultiboost Hair Skin Nails has been extracted from the juice and peel of three varieties of Sicilian blood oranges, grown in the rich soil surrounding the Mount Etna volcano. Blood orange extract is rich in antioxidants, which help decrease oxidative stress in those with compromised antioxidant capacities.

YOU'LL FEEL BETTER ON SWISSE!®

LHS11/11/500

Version No	12
Date last mod	22/11/2011
Size	85x228mm
Designer	BCreative Studio



SWISSE ULTIBOOST HAIR SKIN NAILS - MOCKED UP TO PROPOSED TGA REQUIREMENTS

FREECALL 1800 SWISSEwww.swisse.com

MEDICINES INFORMATION BOX

ACTIVE INGREDIENTS

Each 10 mL contains:  
SILICA-COLLOIDAL ANHYDROUS 350 mg (silicon 164 mg), BLOOD ORANGE EXTRACT (Citrus sinensis standardised extract equiv. to fruit pericarp fresh 18 g), VITAMIN C (ascorbic acid 200 mg)

USES

Swisse Ultiboost Hair Skin Nails liquid is a comprehensive formula containing premium quality ingredients to support the production of collagen and provide essential nutrients for healthy hair, skin and nails. This unique great tasting beauty formula contains silica and vitamin C to support the building blocks of hair, skin and nails and maintain their health and appearance. Blood orange extract is also included for its antioxidant properties. Silica is part

of the mineral matrix that supports collagen structure. Collagen is a major structural protein for healthy and strong connective tissue, blood vessels, tendons and ligaments and helps maintain skin integrity and appearance. Vitamin C assists with collagen production and provides antioxidants to protect cells from potential free radical damage. The blood orange extract included in Swisse Ultiboost Hair Skin Nails has been extracted from the juice and peel of three varieties of Sicilian blood oranges, grown in the rich soil surrounding the Mount Etna volcano. Blood orange extract is rich in antioxidants, which help decrease oxidative stress in those with compromised antioxidant capacities.

ULTIBOOST®

Swisse

HAIR SKIN NAILS

SILICA-COLLOIDAL ANHYDROUS 350 mg (silicon 164 mg) BLOOD ORANGE EXTRACT (Citrus sinensis standardised extract equiv. to fruit pericarp fresh 18 g) VITAMIN C (ascorbic acid 200 mg)

SILICA & BLOOD ORANGE SUPPORTS PRODUCTION OF COLLAGEN & MAINTAINS HEALTHY HAIR SKIN & NAILS

500 mL Oral Liquid

Based on 25+ Years Research

WARNINGS AND ALLERGY INFORMATION

If symptoms persist consult your healthcare professional. Vitamin supplements should not replace a balanced diet. Contains sodium benzoate. No added gluten, lactose, egg, yeast, salt, artificial colours and flavours.

DIRECTIONS

ADULT DOSAGE: 10 mL daily, during or immediately after a meal. Can be taken straight or diluted in water or juice.

STORAGE INFORMATION

Store below 30°C. Shake well before use. Refrigerate after opening.

Swisse Vitamins Pty Ltd  
36-38 Gipps Street, Collingwood VIC Australia 3066  
FREECALL 1800 794 773  
www.swisse.com

Made in Australia

Batch No.

Use by

SWISSE IS A CARBON BALANCED COMPANY. PLEASE RECYCLE.

AUST L 179202

6/12/MOCKUP

Version No	3 TGA mockup
Date last mod	13/8/2012
Size	85x228mm
Designer	Alison Whitehead

Version No	11
Date last mod	5/9/2011
Size	100x320mm
Designer	Alison Whitehead

Version No	11
Date last mod	5/9/2011
Size	100x320mm
Designer	Alison Whitehead

Version No	3 TGA mockup
Date last mod	16/8/2012
Size	100x390mm
Designer	Alison Whitehead