

23rd July 2010

The Secretary, NCCTG
Therapeutics Goods Administration

Reference: Draft "Code of Good Wholesaling Practice for Medicines in Schedules 2,3,4 and 8"

Dear Sir,

We have reviewed the draft code and advise that the NCCTG could consider strengthening the code in relation to Section 8 – Cold Chain Medicines

Inward goods temperature validation procedures could be improved by wholesalers using infrared detectors or similar commercially available readers, this could add some security to ensuring cold chain has been maintained up to arrival in wholesalers premises.

Shipping of cold chain products containing temperature monitors, recording temperature over time, should enable recipients to properly receipt with satisfaction of cold chain integrity.

Section 8, paragraphs 8.11, 8.12, 8.14 and 8.20 could be strengthened.

The code might also introduce the benefits of improving product batch tracking to aid the ability to recall defective goods

If you would like to discuss any of these suggestions further please do not hesitate to contact the undersigned.

Yours Faithfully

Mark Hudders
Managing Director
Anspec Pty Ltd
P.O.Box 767
North Ryde Business Centre NSW 1670
AUSTRALIA
Ph +612 98783111
Fax + 612 98783222
www.anspec.com.au