

16 December 2013

[rasml@tga.gov.au](mailto:rasml@tga.gov.au)

**Re: Chloramphenicol, propamidine, dibromopropamidine and sulfacetamide for ophthalmic use: proposed advisory statements for medicines**

The Society of Hospital Pharmacists of Australia (SHPA) is the national professional organisation for over 3,000 pharmacists, pharmacists in training, pharmacy technicians and associates working across Australia's health system. SHPA is the only professional pharmacy organisation with a strong base of members practising in public and private hospitals and other health service facilities.

SHPA is committed to facilitating the safe and effective use of medicines, which is the core business of pharmacists, especially in hospitals. All medicines have inherent risks; just because a medicine has been deemed as 'low risk' is not a reason for consumers to be denied access to appropriate and accurate information. We would like to highlight that this submission is focussed on safe and appropriate use of these medicines.

**Proposed advisory statements for chloramphenicol**

- We believe the statement "Contact lens wearers should not use this product except on the advice of a doctor or optometrist" should read "Contact lens wearers should not use this product except on the advice of a doctor, optometrist or pharmacist".
- We believe that the statement "If your eye infection does not start to improve within 48 hours, seek immediate medical advice" should also include comment on if the eye infection does not improve within a maximum duration of treatment, seek immediate medical advice.
- We believe that a statement regarding the medicine being contraindicated in individuals with a history of allergic reaction to chloramphenicol should be included.

**Proposed advisory statements for propamidine**

- We believe the statement "Contact lens wearers should not use this product except on the advice of a doctor or optometrist" should read "Contact lens wearers should not use this product except on the advice of a doctor, optometrist or pharmacist".
- We believe that the statement "If your eye infection does not start to improve within 48 hours, seek immediate medical advice" should also include comment on if the eye infection does not improve within a maximum duration of treatment, seek immediate medical advice.
- Consideration should be given to including the statement "Do not use in children under 2 years of age except on medical advice".

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The Society of Hospital Pharmacists of Australia

Mailing address: PO Box 1774 Collingwood 3066 Victoria Australia

Office location: Suite 3, 65 Oxford Street Collingwood 3066 Victoria Australia

T: 61 3 9486 0177 F: 61 3 9486 0311 E: [shpa@shpa.org.au](mailto:shpa@shpa.org.au) W: [www.shpa.org.au](http://www.shpa.org.au)

### **Proposed advisory statements for dibromopropamide**

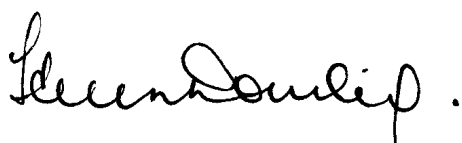
- We believe the statement “Contact lens wearers should not use this product except on the advice of a doctor or optometrist” should read “Contact lens wearers should not use this product except on the advice of a doctor, optometrist or pharmacist”.
- We believe that the statement “If your eye infection does not start to improve within 48 hours, seek immediate medical advice” should also include comment on if the eye infection does not improve within a maximum duration of treatment, seek immediate medical advice.
- Consideration should be given to including the statement “Do not use in children under 2 years of age except on medical advice”.

### **Proposed advisory statements for sulfacetamide**

- We believe the statement “Contact lens wearers should not use this product except on the advice of a doctor or optometrist” should read “Contact lens wearers should not use this product except on the advice of a doctor, optometrist or pharmacist”.
- We believe that the statement “If your eye infection does not start to improve within 48 hours, seek immediate medical advice” should also include comment on if the eye infection does not improve within a maximum duration of treatment, seek immediate medical advice.
- Consideration should be given to including the statement “Do not use in children under 2 years of age except on medical advice”.
- We believe that a statement regarding the medicine being contraindicated in individuals with a history of allergic reaction to sulfacetamide or other sulphonamide antibiotic should be included.

If you would like to discuss the issues raised in this submission or require further information please contact me ([shpa@shpa.org.au](mailto:shpa@shpa.org.au) or 03 9486 0177).

Yours sincerely,



Helen Dowling  
Chief Executive Officer  
(BPharm, DipHospPharmAdmin, GDipQIHCare, FSHP, AICD)