Advertising therapeutic goods to consumers

Complaints handling

Advertising Education and Assurance Section
Regulatory Education and Compliance Branch
Regulatory Practice and Support Division
Complaints Resolution Panel

Complaints about advertising in specified media (including internet) for goods that can be advertised to public

If compliance not achieved - referred to TGA

Industry bodies

Complaints generally about advertising to health professionals & public “below the line” ads

Can impose fines on members and require other actions to be taken

TGA

Complaints about advertising of S4s to public, advertising in other mediums & CRP referrals

Limited compliance tools gain compliance

Previous complaints handling model

Other bodies

Some government based – ACCC, ACMA, state/territory government

Some self-regulatory - e.g. Advertising Standards Bureau
Issues under previous scheme

- Prior to 1 July 2018, complaints were made to the Complaints Resolution Panel (CRP) or TGA.
- CRP could refer complaints to TGA outright or recommend TGA order an advertiser to comply with the CRP’s findings.
- Three possible outcomes of the recommendations:
  - the advertiser agreed to comply and publish a retraction or correction (where required)
  - TGA ordered the advertiser to take an action, such as withdraw an advertisement or publish a retraction or correction (Reg. 9).
    *Only useful where advertiser was also product sponsor as the penalty for failure to comply was removal of the product from the ARTG*
  - the complaint was closed
- Significant effort required over a long period to negotiate compliance, lack of enforcement powers.
- Advertising remains available to consumers – avg 218 days to CRP decision.
- Only the details of the complaint were investigated.
- Advertising Code subjective, limited focus on education and assurance.
New complaints handling model

TGA

- Single complaints handling body
- Streamlined complaints handling processes
- New and enhanced sanctions and penalties

Industry and other bodies

- Pre-approvals cease 1 July 2020
- Support member compliance through education
Our approach to handling complaints

• Consultation was conducted on how we should handle advertising complaints
• See ‘Complaints handling for the advertising of therapeutic goods to the Australian public’ on our website
• Principles:
  – We provide tools & education resources to advertisers to aid them in managing their compliance
  – We focus our resources on alleged non-compliance that has the highest public safety risks
  – We consider the perceptions of & impact on ‘reasonable consumer’ when assessing advertising
  – Our compliance and enforcement actions are evidence-based and depend on the types of behaviours identified, including demonstrated willingness of the advertiser to be compliant
  – Our processes support consistent compliance and enforcement outcomes and provide clarity for the public and advertisers about what is and what is not acceptable in advertising.
Complaints handling process

1. Receive complaint
2. Acknowledge and assess complaint
3. Triage/categorise complaint
4. Refer complaint Internal/external
5. Initiate risk based action
6. Acceptable response?
   - Yes
     - Close complaint
   - No
     - Escalate regulatory action
9. Publish complaint outcome
Categorising complaints

- We consider a range of factors, including:
  - Whether reliance on the claims are likely to result in harm or injury
  - Safe and appropriate use of the good for their intended purpose
  - Action taken by the advertiser, willingness to comply with requirements, and their awareness of their obligations
  - Advertiser prior history and conduct
- Complaints within jurisdiction are categorised as Low, Medium, High or Critical
- Some may be outside our jurisdiction, and may be referred to another regulator
- An assessment may not identify any advertising non-compliance
Risk based regulatory action

Risk based activity model

Nature of alleged breach

Extensive or targeted advertising may be directed to vulnerable groups and/or advertising that is likely to lead to harm or injury if claims made are relied on. Non-compliant advertising that raises public health concerns or undermines accepted public health messages.

Likely Action: Contact person responsible as soon as possible. Directions to address the issue immediately. Use of the most appropriate and timely regulatory tools.

CRITICAL

- Issuance of a directions notice
- Issue a substantiation notice to give information or produce documents about advertising or disseminated generic information
- Issue the advertiser a directions notice
- Cancellation or suspension of the goods
- Civil court action may be considered
- KPI: Action 95% of all cases within 20 working days

HIGH

- Warning to advertisers: requiring response within 14 days
- Issue a directions notice
- Guidance materials
- Education and training
- KPI: Action 95% of all cases within 40 working days

MEDIUM

- Guideline materials
- Education and training
- KPI: Action 95% within 14 working days (if no response case closed, details of advertiser and goods not published in our compliance outcomes.)

LOW

- Guidance materials
- Education and training
- KPI: Action 95% within 14 working days (if no response case closed, details of advertiser and goods not published in our compliance outcomes.)

Risk based regulatory action can include:

- Investigation or criminal or civil court action
- Issue the advertiser a directions notice
- Apply to a federal court for an injunction
- Publish a public warning notice
- Enforceable undertaking
- Cancellation or suspension of the goods
- KPI: Action 95% of all cases within 10 working days

One-off or isolated alleged breach not considered serious in terms of being misleading as to the proper contents, identification or use of the goods.

Alleged non-compliance does not involve blatant or ongoing disregard by the advertiser.

Likely Action: Advertiser is sent an obligations letter. The letter advises of the alleged breach and regulatory tools available to address further non-compliance and contains information and guidance to assist with future compliance but if a response is not required, advertiser can contact the TGA to dispute/discuss the alleged breach.
## Low

<table>
<thead>
<tr>
<th>Risk</th>
<th>Likely action</th>
</tr>
</thead>
<tbody>
<tr>
<td>• One off or isolated non-compliance</td>
<td>• Obligations letter with education material</td>
</tr>
<tr>
<td>• Low risk of harm</td>
<td></td>
</tr>
<tr>
<td>• Advertiser has not previously come to the TGA’s attention</td>
<td></td>
</tr>
</tbody>
</table>

**Example:** Advertisement promotes therapeutic goods in a manner that is misleading as to their proper use or effect, but the product has low to no risk of harm, and the advertiser is unaware their claim is in breach

**Outcome published:** Yes. However for reasons of natural justice, TGA reporting of closed low matters will not specify the details of the advertiser or the goods involved because the TGA has not investigated nor made a formal finding in relation to the advertising.
## Medium

<table>
<thead>
<tr>
<th>Risk</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Ongoing advertising breaches, or where an advertiser has been made aware of their obligations in the past</td>
<td>• Warning</td>
</tr>
<tr>
<td>• Advertisement encourages unnecessary use</td>
<td>• Directions notice</td>
</tr>
<tr>
<td></td>
<td>• Infringement notice</td>
</tr>
<tr>
<td></td>
<td>• Guidance</td>
</tr>
<tr>
<td></td>
<td>• Education and training</td>
</tr>
</tbody>
</table>

**Example:** Where a Schedule 3 medicine is being advertised to the public in a way that encourages unnecessary use but there are no other public health concerns

**Outcome published:** Yes
Including the name of the advertiser and goods involved
## High

<table>
<thead>
<tr>
<th>Risk</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Continued non-compliance despite evidence that the advertiser is aware of their obligations</td>
<td>• Infringement notice</td>
</tr>
<tr>
<td>• Non compliance that is more serious in nature and may include prohibited or restricted representations</td>
<td>• Substantiation notice</td>
</tr>
<tr>
<td>• Advertising likely to lead to excessive use, or impact on the ability to use the therapeutic goods safely, in line with intended use</td>
<td>• Directions notice</td>
</tr>
<tr>
<td></td>
<td>• Cancellation or suspension of the goods</td>
</tr>
<tr>
<td></td>
<td>• Civil or criminal court action may be considered</td>
</tr>
</tbody>
</table>

**Example:** Where a reference is made to a serious medical condition where choosing the product over conventional medical treatment may have a significant effect on the consumer’s prognosis

**Outcome published:** Yes

Including the name of the advertiser and goods involved
Critical

<table>
<thead>
<tr>
<th>Risk</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Involves advertising of therapeutic goods that claim to treat serious or very serious conditions that require diagnosis/ongoing treatment from a medical practitioner</td>
<td>• Investigate with view to prosecution of a civil or criminal penalties provision</td>
</tr>
<tr>
<td>• Advertising to vulnerable or disadvantaged consumers</td>
<td>• Directions notice</td>
</tr>
<tr>
<td>• Risk that use may result in or is likely to result in harm or injury</td>
<td>• Apply to Federal Court for injunction</td>
</tr>
<tr>
<td>• Advertising may cause harm to a large group of consumers or particular individuals</td>
<td>• Publish a public warning notice</td>
</tr>
<tr>
<td>• Undermining public health campaigns</td>
<td>• Enforceable undertaking</td>
</tr>
<tr>
<td></td>
<td>• Cancellation or suspension of the goods</td>
</tr>
</tbody>
</table>

Example: Advertising a product for the treatment of cancer where the product has not been evaluated by the TGA, or is a listed complementary or registered over the counter medicine

Outcome published: Yes

Including the name of the advertiser and goods involved
Our compliance toolkit
What’s in our compliance toolkit?

Voluntary compliance

• **Education program** (further information about this later in the afternoon)
• **Enquiry services**
• **Advertising** **pre-approvals** remain until June 2020

Assisted compliance

• **Obligations Notice** – informs advertisers that their advertising may not be compliant and advises them of their obligations
• **Warning** - informs advertisers that their advertising is non-compliant and advises them of regulatory action that may be taken if they fail to respond/comply – requires a written response
What’s in our compliance toolkit? (2)

Regulatory Compliance

- Substantiation Notice
- Directions Notice
- Cancellation or suspension of the therapeutic good from the ARTG
- Public Warning Notice
- Injunction from the Federal Court or Federal Circuit Court
- Infringement Notice
- Enforceable Undertaking
- Prosecution of a civil penalty provision
- Referral to the Commonwealth Director of Public Prosecutions for criminal prosecution
Enforcement discretion

- Pragmatic approach taken to non-compliance where a complaint is received after 1 January 2019 about an advertisement that would have been compliant with the 2015 Code.

<table>
<thead>
<tr>
<th>January – June 2019</th>
<th>June – December 2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>The action taken (in the absence of other non-compliance) will be a reminder about the advertising requirements of the 2018 Code.</td>
<td>We will seek information about what is being done to correct the advertising, including the date corrective action commenced before determining whether to apply enforcement discretion.</td>
</tr>
</tbody>
</table>
Obligations letter

• For addressing low priority complaints using an education based approach
• If you receive one:
  – read it carefully
  – assess your advertising for compliance
  – get help if you need it
• The TGA will generally only issue this letter to an advertiser once
• Future complaints are likely to be given a higher priority
Warning

• Often used for addressing medium priority complaints in the first instance
• If you receive one:
  – read it carefully
  – get help if you need it
  – assess your advertising for compliance
  – respond within the required timeframe
  – address compliance issues ASAP
• Failure to address advertising issues may result in escalating action
Substantiation notice – s.42DR

- Used to obtain further information for management of the case
- For example to identify:
  - the advertiser responsible, or
  - whether the advertising claims are substantiated
- If you receive one, read it carefully and respond as outlined in the notice
- Failing to reply or providing false or misleading information is an offence

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**The Managing Director**

[Sponsor]

[Sponsor Address]

[Suburb State Postcode]

Email: [Sponsor email address]

Dear Sir/Madam

**Request for Information Notice**

Re: [Product Name] (ARTG #)

I am writing to request information about your advertising of the therapeutic goods above. We have recently received a complaint about potential advertising issues in relation to this product. The TGA is undertaking a review to assess whether the advertising meets the requirements as set out in the Therapeutic Goods Act 1989 (the Act), the Therapeutic Goods Regulations 1990, and the Therapeutic Goods Advertising Code 2015 (the Code).

**DUE DATE**

In accordance with section 42DR of the Act, would you please provide the required information as detailed below by **ReplyDueDate**.

**ADEQUATE TIMEFRAME**

Please make an assessment of the time involved in replying to this request and, if you believe that you need more time than that allocated above, raise your concerns with me immediately.

If you believe now that the time allowed is adequate, but at some stage in the process of documenting your reply you have difficulties meeting the due date, please contact me as soon as you are aware of these difficulties.

**A. What information do I need to provide?**

1. A list of the evidence you hold to support all indications/claims that you make in relation to your medicine.
Directions – s.42DkB & s.42DV

• Generally won’t be issued without prior contact with advertiser
• Used to direct an advertiser to:
  – cease using a particular claim or advertisement
  – issue a retraction or correction, and/or
  – destroy the advertisement and recover any ads still in circulation
• If you receive one:
  – read it carefully and consider how you will address the notice
  – respond to the notice within the specified timeframe
• Failing to comply with a direction is an offence
Publication of Directions

The TGA has published one Direction:

- Advertising of Gumby Gumby capsules
- Advertiser **complied** with the direction to:

**Cease making claims or representations for Gumby Gumby capsules outright or in the form of testimonials that:**

- They have or may have an effect on cancer of any sort, location or grade
- They have or may have an effect on arthritis, chronic fatigue syndrome, or skin diseases
- They have or may have any other therapeutic use whatsoever while ever the capsules are not included in the Australia Register of Therapeutic Goods (ARTG)
- You can or are able to arrange the supply of these therapeutic goods which are not included in the ARTG and not excluded or exempted from that requirement
Publication of Retraction

**RETRACTION**

An advertisement for Invisible Zinc sunscreen, which we published on this website, should not have been published. In the advertisement we implied that other sunscreens or their ingredients could be harmful or ineffective, or could provide inadequate protection against UV radiation that can cause skin cancer.

A complaint about the advertisement was recently upheld by the Complaints Resolution Panel.

The Panel found that claims in the advertisement were unlawful, inaccurate and misleading, and breached the Therapeutic Goods Advertising Code (the Code).

The full text of the Panel's determination can be found at: www.tgacrp.com.au/complaints

The Delegate of the Secretary for the purposes of regulation 9 of the Therapeutic Goods Regulations also found that the claims and representation in the advertisement were unlawful, inaccurate and misleading and breached the Code.

The Delegate of the Secretary therefore ordered that we publish this retraction.
Direction notice reviews

• Direction notice includes consequences of non-compliance and rights for review

• Advertiser may request a review of the ‘initial’ decision to issue a direction

• The initial decision remains in effect unless and until it is revoked or substituted by a new decision
Public warning notice – s.42DY

- TGA may publish a notice to alert consumers to a suspected contravention of the advertising requirements
- Must be in the public interest
- Key consideration - is there an imminent need to inform consumers so they can avoid suffering detriment from advertisements about therapeutic goods?
  - an actual or a perceived risk to public health from advertising non-compliance
  - advertising from persons who persistently or deliberately operate outside the TGA regulatory scheme
- Can also be issued if a person fails to respond to a substantiation notice and it is in the public interest to alert the public
Consumer alerts

Sanoma Garden - various therapeutic goods

Consumer alert

25 October 2016

Consumers are advised not to purchase medicines or medical devices being offered by Sanoma Garden.

Material from Sanoma Garden may create the impression that they have Australian-based operations, with a local post office box address and phone number, however, this is not the case.

Sanoma Garden advertises medicines and medical devices for the relief, treatment or prevention of serious diseases, conditions and ailments. These claims have not been verified by the TGA.

Consumers should be aware that therapeutic goods purchased via Sanoma Garden:

- are not subject to Australia’s stringent requirements for quality, safety or efficacy (effectiveness), and
- are unlikely to deliver on the claims of efficacy that are set out in the promotional material.

In addition, consumers should be aware that purchases made via Sanoma Garden:

- are unlikely to be protected by Australian Consumer Law or other fair trading laws, and
- may result in personal details, including credit card information, being sent to unknown overseas entities.

Products supplied by mail order from overseas are not regulated by the TGA. If care is not taken, consumers may inadvertently risk their health and waste their money.
Infringement notices – Part 5A-2 of the Act

• Infringement notices are administrative fines - an alternative to:
  – criminal prosecution for a strict liability criminal offence, or
  – litigation for contravention of a civil penalty provision.

• TGA can now issue infringement notices for non-compliance with
  – the advertising requirements, and
  – other requirements in the Act
    (wherever there is a strict liability offence)

• TGA will publish the details of infringement notices issued
Impact of infringement notices on advertisers

• Amount for an infringement notice:
  – 12 penalty units (individual) or 60 penalty units (company)
  – multiple notices can be issued (e.g. for multiple contraventions)

• Payment of an infringement notice:
  – pay by the due date to prevent further legal action
  – does not amount to an admission or finding that the advertiser has contravened the Act

• Advertiser still needs to make advertising compliant - further instances of non-compliance may escalate regulatory or legal action
ACCC infringement notices

Two retailers of adjustable beds and mobility products pay $20,400 each in penalties

Cancellation/suspension from ARTG

• Once a therapeutic good is cancelled or suspended from the ARTG, it cannot be supplied
• The TGA may cancel or suspend goods from the ARTG where the sponsor of those goods:
  – fails to ensure compliant advertising, and
  – does not adequately respond to other regulatory tools (such as directions)
• Cancellation or suspension may also occur to address other compliance issues
• Cancellations and suspensions are published on the TGA website
• There are different provisions for cancellation and suspension depending on the type of good
### Act provisions for cancellation/suspension

<table>
<thead>
<tr>
<th>Type of good</th>
<th>Suspension</th>
<th>Immediate cancellation</th>
<th>Cancellation with notice</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medicine/OTG</td>
<td>s.29D</td>
<td>ss.30(1)</td>
<td>ss.30(2)</td>
</tr>
<tr>
<td>Biologicals</td>
<td>s.32FA</td>
<td>s.32GA</td>
<td>s.32GC</td>
</tr>
<tr>
<td>Medical device</td>
<td>s.41GA</td>
<td>s.41GL</td>
<td>s.41GN</td>
</tr>
</tbody>
</table>

- Advance notice of suspension of goods is generally given unless there is potential for death, serious illness or injury as a result of the goods
- Failure of a sponsor to comply with an advertising direction notice is grounds for immediate cancellation
Product Cancellation

Cancellation of Sensaslim Solution from the ARTG

24 November 2011

The TGA has cancelled the listing of Sensaslim Solution (AUST L 176003) from the Australian Register of Therapeutic Goods (ARTG). The cancellation is because of a failure to comply with requirements of the Therapeutic Goods Act 1989 relating to the advertising of the product.

The cancellation is effective from 1 December 2011. From 1 December 2011, the following activities may constitute an offence or give rise to a civil penalty under the Therapeutic Goods Act 1989:

- importing Sensaslim Solution into Australia
- exporting Sensaslim Solution from Australia
- manufacturing Sensaslim Solution in Australia
- supplying Sensaslim Solution in Australia.

Advertising Sensaslim Solution may also constitute an offence under the Act.

This cancellation is not related to the safety of the product. The product is not being recalled.
Injunctions – Part 5-4 of the Act

• The Secretary can approach the Federal Court for an injunction to:
  – restrain a person from contravening the legislation, or
  – to compel compliance with the legislation

• The injunction may be permanent or interim

• The injunction may be pursued in conjunction with other enforcement actions (e.g. civil penalties)
Enforceable undertakings – Part 5A-3

• When dealing with a matter about non-compliant advertising, TGA may accept an offer from an advertiser to enter into a written undertaking as an alternative to court action

• If the TGA accepts the undertaking, the advertiser would be bound by the terms agreed to in the undertaking

• Terms of undertakings may include training requirements, compliance requirements

• A breach of the terms can result in the matter being referred to the Federal Court who can order the advertiser to comply with the undertaking, pay damages

• Details of undertakings are published on the TGA website
Criminal and civil penalties

• Can only be imposed by a Court
• Such action would not be a surprise to an advertiser:
  – the TGA would have tried other avenues to achieve compliance first
• Court action may be taken against:
  – a recipient of a substantiation notice that has not responded to the notice or has provided false/misleading information in a response
  – a recipient of a direction/infringement notice that doesn’t comply with the notice
  – advertisers that promote goods in a way that raises public safety concerns and/or has been unwilling to comply with previous compliance actions
• TGA will not publish details of matters proceeding to court until after final outcome
### Key advertising offence provisions

<table>
<thead>
<tr>
<th>Type of good</th>
<th>Requirement</th>
<th>Criminal offence</th>
<th>Civil penalty</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medicines, OTGs</td>
<td>Prohibits promotion of off-label use</td>
<td>ss.22(2), (3) &amp; (5)</td>
<td>ss.21B(4)</td>
</tr>
<tr>
<td>Biologicals</td>
<td>Prohibits promotion of off-label use</td>
<td>ss.32BJ(2A)-(4)</td>
<td>s.32BL</td>
</tr>
<tr>
<td>Medical devices</td>
<td>Prohibits promotion of off-label use</td>
<td>s.42ML</td>
<td>s.41MLB</td>
</tr>
<tr>
<td>All</td>
<td>Pre-approval offences</td>
<td>s.42C</td>
<td>N/A</td>
</tr>
<tr>
<td>All</td>
<td>General advertising offences</td>
<td>s.42DL</td>
<td>s.42DLB</td>
</tr>
<tr>
<td>All</td>
<td>Non-compliance with Code</td>
<td>s.42DM</td>
<td>s.42DMA</td>
</tr>
<tr>
<td>All</td>
<td>Failing to comply with/misleading info in reply to a substantiation</td>
<td>s.42DS</td>
<td>s.42DT</td>
</tr>
<tr>
<td>All</td>
<td>Failing to comply with direction notice</td>
<td>s.42DW</td>
<td>s.42DX</td>
</tr>
</tbody>
</table>
## Three-tier criminal offence provisions

<table>
<thead>
<tr>
<th>Tier</th>
<th>Condition</th>
<th>Penalty</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>the use of the goods in reliance on the advertisement has resulted in, will result in, or is likely to result in, harm or injury to any person</td>
<td>imprisonment for 5 years or 4,000* penalty units or both</td>
</tr>
<tr>
<td>2</td>
<td>harm not necessarily demonstrable but intent evident</td>
<td>imprisonment for 12 months or 1,000* penalty units, or both</td>
</tr>
<tr>
<td>3</td>
<td>Strict liability (intent doesn’t need to be demonstrated)</td>
<td>100** penalty units</td>
</tr>
</tbody>
</table>

* As at 1 July 2017, 1 penalty unit = $210. Offences by body corporates attracts 5x multiplier on penalty units
+ Infringement notices are an alternative to strict liability offences
New civil penalty provisions for advertising

• Corresponding civil penalties added to complement most criminal offences applying to advertising non-compliance

  – 5,000 penalty units – individual

  – 50,000 penalty units – body corporate

• Lower burden of proof than criminal offences
CORRECTIVE NOTICE ORDERED BY THE FEDERAL COURT OF AUSTRALIA

Misleading conduct regarding NUROFEN "specific pain" products

Since 2007, Reckitt Benckiser (Australia) Pty Ltd has marketed and supplied the following NUROFEN branded products as part of a "specific pain" range:

Following action by the Australian Competition and Consumer Commission, the Federal Court of Australia declared by consent that Reckitt Benckiser engaged, or was likely to have engaged, in misleading or deceptive conduct by representing that each product in the NUROFEN "specific pain" range was specifically formulated to treat, and solely or specifically treated, the particular type of pain specified on the packaging of that product.

The Court declared by consent that Reckitt Benckiser's conduct was, or was likely to be, misleading to consumers because each of these four products is of the same formulation, contains the same active ingredient (ibuprofen lysine 342mg) and has the same efficacy in treating back pain, period pain, migraine pain and tension headache as any of the other products in the NUROFEN "specific pain" range.

The Court by consent ordered Reckitt Benckiser to stop promoting products with this packaging, and to procure the removal packaging from retail outlets. Reckitt Benckiser was also ordered to publish this corrective notice, to implement a compliance program and to pay the ACCC's costs. The issue of pecuniary penalty will be determined at a separate hearing.
Cooperating with other regulators

• TGA works cooperatively with state/territory and other Commonwealth regulators

• If we receive a complaint outside our jurisdiction, we will refer it on
  – practice issues – AHPRA or state/territory government
  – pricing and unconscionable conduct issues – ACCC or state/territory government
  – sole traders operating intra-state - state/territory government

• We will collaborate with other regulators to achieve a better outcome
Top 5 tips to prevent compliance action

- Be contactable by the TGA
- If you receive correspondence from the TGA, read it
- Reply to TGA correspondence within specified timeframe
- Have robust procedures in your business for dealing with correspondence and checking advertising compliance
- Address compliance issues expeditiously
- Don’t wait for a complaint to collate supporting evidence for ads
Further information

• We provide a range of tools to assist advertisers and in managing their compliance, including:
  – E-learning modules
  – Fact sheets
  – Webinars
  – Roadshows
  – Subscribe to TGA website updates
  – Facebook, Twitter
  – Contact: advertising.education@tga.gov.au
Questions?

Email: Advertising.Education@tga.gov.au