

13 October 2017

Advertising Compliance Unit  
Regulatory Practice, Education and Compliance Branch  
Therapeutic Goods Administration  
PO Box 100  
WODEN ACT 2606

By email to: [advertising.consultation@tga.gov.au](mailto:advertising.consultation@tga.gov.au)

Dear Sir/Madam

**Re: Therapeutic Goods Advertising Code: Proposed improvements including proposed framework for Schedule 3 medicine advertising**

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to contribute to the Therapeutic Goods Administration's (TAG) consultation regarding the proposed changes to improve the Therapeutic Goods Advertising Code (the Code) and a possible framework for the advertising of pharmacist-only (Schedule 3) medicines to the public.

In April 2017, the RANZCP took the opportunity to provide feedback to the TGA consultation regarding the scheduling policy framework (SPF) and advertising of Schedule 3 substances. In our submission, we directed the TGA to the RANZCP's position statement on [Direct-to-consumer advertising of pharmaceuticals](#), which details our opposition to the advertising of prescription substances.

The RANZCP is still concerned about the proposal to allow Schedule 3 medicines to be advertised directly to the consumers. Whilst acknowledging that the proposal would retain the current mechanism to specify those substances that may be advertised to the public (i.e. a positive list), the RANZCP would like to reiterate its view that the advertising of pharmacist-only substances would carry some risks. This includes the potential for the provision of biased information to consumers, which may result in consumers overestimating or misunderstanding the effects of certain medicines.

Ref: 0867o