



18 July 2024

Department of Health and Aged Care
Therapeutic Goods Administration
PO Box 100, Woden ACT 2606
Via email: TGA.Scientific@health.gov.au

Dear Therapeutic Goods Administration (TGA),

Re: Updates to medicine labelling rules: public consultation on proposed changes to TGO 91 and TGO 92 to support medicine safety

The Royal Australian College of General Practitioners (RACGP) thanks the Therapeutic Goods Administration (TGA) for the opportunity to provide comment on the public consultation on proposed changes to TGO 91 and TGO 92 to support medicine safety.

The RACGP supports the proposed amendments for TGO 91 and TGO 92. We provide the following comments for your consideration.

Proposed amendments to TGO 91

- *For medicines for injection administered by healthcare professionals that need some preparation before use, make sure that clear instructions on how to prepare and store these products is available to health professionals in an appropriate format.*

RACGP comment: It is important these instructions are in a large and clear font, easily seen by time poor health professionals who need to find important information quickly.

- *Proposal to allow a QR code to link to electronic information instead of a separate package insert where preparation information cannot fit on the label*

RACGP comment: While a QR code option is helpful, it is also important to have physical copies of the information available, particularly as a backup for areas with poor internet coverage.

Thank you again for the opportunity to provide a submission to this consultation. If you have any questions, please contact Mr Stephan Groombridge, National Manager, Practice Management Standards & Quality Care at stephan.groombridge@racgp.org.au or 03 8699 0544.

Yours sincerely

Dr Nicole Higgins
President