

14 March 2019

Ms Gillian Mitchell
First Assistant Secretary
Regulatory Practice and Support Division
Health Products Regulation Group
Advertising Education and Assurance Section
PO Box Woden ACT 2606
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Email: advertising.consultation@health.gov.au

Dear Ms Mitchell,

Re: Therapeutic goods advertising: ensuring 'natural' claims are not misleading

The Royal Australian College of General Practitioners (RACGP) thanks the Therapeutic Goods Administration (TGA) for the invitation to comment on the consultation document: *Ensuring 'natural' claims are not misleading*, February 2019.

The RACGP's response covers the following:

1. Ensuring consumers are not misled by inaccurate claims by advertisers
2. Interpretation of how people understand the claims 'natural', and 'naturally derived'
3. Quantity and concentration of naturally derived ingredients.

1. Ensuring consumers are not misled by inaccurate claims by advertisers.

It is important that consumers are not misled by inaccurate claims by advertisers. To provide the community with confidence that the Therapeutic Goods Administration will respond appropriately in such instances, the Therapeutic Goods Administration should provide details how it will monitor compliance of its recommendations and what penalties will be in place for non-compliance.

2. Interpretation of how people understand the claims 'natural', and 'naturally derived'

The RACGP agrees with the Therapeutic Goods Administration interpretation of how people understand the claims 'natural', and 'naturally derived', and the risks of implying that 'natural' is related to 'safer'.

The examples used in the document to explain corporate taglines are useful. We recommend that these examples be expanded on, including a table clearly summarising what is considered "not-natural" – which would be helpful to support advertisers in being compliant with legislation.

3. Quantity and concentration of naturally derived ingredients

A major concern is that the quantity and concentration of naturally derived ingredients can be far in excess or far less than found in foods. It should be stated in the introduction to the document that any substance – natural, naturally derived or other – can have a biological impact, including side-effects.

Therefore, the RACGP recommends that producers be required to inform consumers about the equivalent concentration of ingredients, for example:

- 'Contains naturally derived garlic equivalent to 2 cloves in each capsule'
- 'Contains naturally derived grapefruit vitamin C equivalent to one segment of a fresh grapefruit'.

The RACGP thanks the Therapeutic Goods Administration again for the opportunity to comment. If you have any further queries please contact Mr Stephan Groombridge, Manager, eHealth and Quality Care on (03) 8669-0544 or at stephan.groombridge@racgp.org.au

Yours sincerely



Dr Harry Nespolon
President



Dr Charlotte Hesse
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