

24 February 2021

Therapeutic Goods Administration
Complementary and Over-the-Counter Medicines Branch
PO Box 100
Woden ACT 2606

Dear Complementary Medicines Secretariat,

The Royal Australian College of General Practitioners (RACGP) thanks the Therapeutic Goods Administration (TGA) for the opportunity to provide a response to the consultation on *Efficacy monographs for listed medicine*. We provide the following comments for your consideration:

Monograph for vitamin B6

The monograph for vitamin B6 is thorough, and the background section is useful. It could be improved by referencing more recent evidence, particularly in regard to levels of B6 deficiency in the adult population.

Monograph for vitamin B12

This monograph provides in-depth information on vitamin B12 metabolism and the biochemical impact of its supplementation. However, we are concerned that companies selling B12 supplements could selectively choose the information they provide in the evidence brief to consumers. We also note some of the test ranges for B12 deficiency fall outside those in the current Medicare Benefits Schedule (MBS), and of the changes recommended by the [MBS Taskforce's Diagnostic Medicine Clinical Committee](#). The RACGP recommends:

- a section on clinical use and experience is included.
- that the evidence brief should emphasise the vast majority of patients do not require a B12 supplement.
- more information in the 'permitted indications' would help treatments to be appropriately targeted.

The RACGP thanks the TGA for the opportunity to provide comment on this consultation. For any enquiries regarding our response, please contact Stephan Groombridge, e-Health and Quality Care Manager on 03 8699 0544 or stephan.groombridge@racgp.org.au

Yours sincerely



Dr Karen Price
President