



The Project Officer  
TGO 80 Consultation 2010  
Office of Laboratories & Scientific Services  
Therapeutic Goods Administration  
PO Box 100  
Woden ACT 2606

Dear Project Officer

**CHC Submission – Consultation Paper: Proposed Amendments to TGO 80 (February 2010)**

Thank you for the opportunity for the complementary healthcare industry to provide comment on the proposed amendments to the Therapeutic Goods Order 80 – *Child-Resistant Packaging for Medicines* (TGO80), dated February 2010.

The Complementary Healthcare Council (CHC) supports the use of child-resistant packaging for therapeutic goods, including complementary medicines, for the reduction of accidental poisonings in children however seeks further clarification on the proposed amendments for cough and cold medicines.

**Specific Comments**

The CHC notes the following statement within the consultation paper: *“.....all over-the-counter cough and cold medicines, including topical preparations such as oxymetazoline and xylometazoline decongestants, should be marketed in containers with child-resistant closures”*.

The CHC seeks further clarification whether the intent of the proposal is to include complementary medicines indicated for the treatment of the symptoms of cough and cold. The CHC notes that the outcomes of the review conducted by the TGA on cough and cold medicines (21 April 2009) did not include complementary cough and cold medicines yet the current proposal will capture such products indicated for the treatment of the symptoms for use in children. The CHC considers the safety concern is around OTC medicines and that complementary medicines should not be captured under this provision.

If you would like to discuss any matters within this submission further, please do not hesitate in contacting me.

Yours sincerely

Kristy Tomas  
Scientific & Technical Manager

19 March 2010.