LISTED MEDICINE REVIEW CHECKLIST

TRIM Container						
ARTG Number (AUST L)						
Product Name						
Sponsor						
Sections Reviewed	Labelling	☑	Manufacturing	☑	Evidence	☑

* The scope of this review is to check that the quantity limits of caffeine are met for the medicine and the warnings are present if relevant on the label and the sponsor's website advertising for the medicine, as follows:

A. Specific requirements on caffeine (active ingredient) in 26BB:

When used as an excipient, only for use in topical medicines for dermal application.

Only for use as an active ingredient for oral use in adults when the medicine consists principally of one or more designated active ingredients prescribed in Schedule 14 to the Regulations (other than caffeine).

(Quantity limits):

When for internal use or oral application, the maximum recommended daily dose of the medicine must provide no more than 100 mg of caffeine from this ingredient. (Poisons Standard: <=600 mg total caffeine daily)

When the medicine is packaged for supply as a divided preparation and is for internal use or oral application, the medicine must not contain a concentration of total caffeine greater than 33%.

~~*When the medicine is packaged for supply as an undivided preparation and is for internal use or oral application, the medicine must not contain a concentration of total caffeine greater than 4%.*~~

When the medicine is packaged for supply as an undivided preparation and is for internal use or oral application, the medicine must not contain a concentration of total caffeine greater than 1%.

When the medicine is for internal use or oral application, a maximum recommended dose of the medicine must not provide more than 100 mg of total caffeine within a 3 hour period.

(Warnings):

When for internal use or oral application, the following warning statement is required on the medicine label:

- *(ADULT) 'Adults only' (or words to that effect).*

When the maximum recommended daily dose of the medicine provides greater than 10 mg of total caffeine and the medicine is for internal use or oral application, the following warning statements are required on the label:

- *(CAFF) 'Contains [state quantity per dosage unit or per mL or per gram of product] total caffeine [per dosage unit or per mL or per gram]. A cup of instant coffee contains approximately 80mg of caffeine.'*
- *(CAFFPREG) 'Caffeine intake more than 200 mg per day is not recommended during pregnancy or breastfeeding.'*

When the maximum recommended daily dose of the medicine provides greater than 80 mg of total caffeine and the medicines is for internal use or oral application, the following warning statements are required on the label:

- *(CAFFLMT) 'Limit the use of caffeine-containing products (including tea and coffee) when taking this product.'*
- *(CAFFCYP) 'Caffeine interacts with enzyme CYP1A2 in the liver. Consult your health professional before taking with other medicines' (or words to that effect)."*

B. Specific requirements on caffeine in Poisons Standard:

SCHEDULE 4 (**Prescription Only Medicine**, or **Prescription Animal Remedy** – Substances, the use or supply of which should be by or on the order of persons permitted by State or Territory legislation to prescribe and should be available from a pharmacist on prescription.)

*CAFFEINE for internal therapeutic use **except:***

a) in divided preparations when labelled with a maximum recommended daily dose of no greater than 600 mg of total caffeine; or

b) *in undivided preparations with a concentration of less than 5 per cent of caffeine and when labelled with a maximum recommended daily dose of no greater than 600 mg of total caffeine.*

SCHEDULE 6 (**Poison** – Substances with a moderate potential for causing harm, the extent of which can be reduced through the use of distinctive packaging with strong warnings and safety directions on the label.)

CAFFEINE ***except****:*

a) *when included in Schedule 4; or*

b) *in divided preparations for internal human therapeutic use when labelled with a maximum recommended daily dose of no greater than 600 mg of total caffeine; or*

c) *in undivided preparations for internal human therapeutic use with a concentration of less than 5 per cent of total caffeine and when labelled with a maximum recommended daily dose of no greater than 600 mg of total caffeine; or*

d) *in preparations for external use; or*

e) *in other preparations with a concentration of less than 5 per cent of caffeine.*

Therefore, please evaluate:

- Labels (and website): L8, L19.
- Manufacturing: 12 (FPS), 13 (FPS), 26 (Formulation), and Quantitative analysis (COA)

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s22 [redacted]

s22 [redacted]

s22 [redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]

[redacted]

s22 [redacted]

Label

Relevant TRIM reference						
Type of label reviewed	Immediate	☐	Primary	☐	Blister	☐
1. Reviewed by				Date		
2. Peer reviewed by	(if necessary)			Date		
3. Reviewed by				Date		

Summary of issues to pursue in the P2C	(e,g, NA if no issues)
Action	s22 [redacted]
Grounds for cancellation s22 [redacted]	

Requirement	**Relevant legislation**	**Deficiency Identified**	Pack Type 1	Pack Type 2	**COMMENTS**
			N/A	**N/A**	

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
Required particulars on the label					
1. Name of goods consistent with ARTG entry. Separate and distinct goods? • Must be included on the 'main label' of the label and must be presented in a continuous, uninterrupted manner and not be broken up by additional information or background text. • Must appear as cohesive unit with the name of active ingredients unless excepted under subclause 9(3)(b) • All text oriented in the same direction (except AUST L number can be oriented in any direction, TGO 92 Guidance)	- Paragraph 8(1)(a) of TGO 92 - Paragraph 9(1)(a) of TGO 92 - Subclause 9(2) of TGO 92 - Clause 6 of TGO 92 for definition of 'name of the medicine' and 'main label' - Subclause 8(4) of TGO 92 - Subclauses 9(3), 9(5), 9(6) and 9(8) of TGO 92 - Subclause 9(4) of TGO 92 (all text oriented in same direction) - - Subclause 10(7) of TGO 92 - Paragraph 16(1A)(d) of the Act - Paragraph 11(1)(a) of the Regulations	☐			
2. Formulation consistent with ARTG. • Separate and distinct goods?	- Subsection 16(1A) of the Act - Regulation 11(1) of the Regulations	☐			
3. Correct Australian approved names of all active ingredients. • Must be included on the 'main label' of the label unless subclause 9(5) or 9(6)(b) of TGO 92 applies. • The ingredient names on the ARTG may be different to the Sponsor's documents: pursue if the changes are not related to IHIN changes (the transition period to make the changes expires in April 2020). • Inclusion of common names of vitamins is permitted in addition to the AAN in accordance with subclause 11(5)	- Paragraph 8(1)(b) of TGO 92 - Subclauses 9(3), 9(5) and 9(6) of TGO 92 - Subclause 10(7) of TGO 92 - Clause 6 of TGO 92 for definition of 'name of an active ingredient' - Subclause 11(5) of TGO 92 (inclusion of common names of vitamins)	☐			
4. Quantity or proportion of all active ingredients in the goods – with correct expression and units. • Must be included on the 'main label' of the label unless subclause 9(5) or 9(6)(b) of TGO 92 applies. • Quantity requirements for enzymes and microorganisms subclause • Composite packs	- Subclause 11(1) of TGO 92 - Paragraph 9(1)(c) of TGO 92 - Subclause 9(5), 9(6) of TGO 92 - Subclause 10(7) of TGO 92 - Subclause 11(2) of TGO 92 - Subclause 9(8) of TGO 92 for composite packs	☐			

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
5. TGO 92 Schedule 1 Substances or Groups of Substances declared.	- Paragraph 8(1)(j) of TGO 92 - Schedule 1 of TGO 92	☐			
6. Correct name of dosage form (main label) as entered in the ARTG e.g. soft capsule, etc.	- Paragraph 8(1)(d) of TGO 92 - Paragraph 9(1)(d) of TGO 92 - Paragraph 9(6)(a) of TGO 92 - Subclause 10(7) of TGO 92 for small containers - Subclause 10(8) of TGO 92 for individually wrapped dosage - Subclause 10(9) of TGO 92 for blister packs - Clause 6 of TGO 92 for the definition of name of dosage form - TGA eBS Listed Medicines Validation Rules (accessed through Lotus Notes)	☐			
7. Quantity of the goods (main label).	- Paragraph 8(1)(e) of TGO 92 - Paragraph 9(1)(e) of TGO 92 - Clause 6 of TGO 92 for definition of 'quantity of the medicine' - Subclauses 9(3), 9(5) and 9(6) of TGO 92 - Subclause 10(7) of TGO 92 for small containers - Subclause 10(8) of TGO 92 for individually wrapped dosage forms - Subclause 10(9) of TGO 92 for blister packs	☐			

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
8. Required warning statements and representations present, correct and complete. • *When for internal use or oral application, the following warning statement is required on the medicine label:* *- (ADULT) 'Adults only' (or words to that effect).* • *When the maximum recommended daily dose of the medicine provides greater than 10 mg of total caffeine and the medicine is for internal use or oral application, the following warning statements are required on the label:* *- (CAFF) 'Contains [state quantity per dosage unit or per mL or per gram of product] total caffeine [per dosage unit or per mL or per gram]. A cup of instant coffee contains approximately 80mg of caffeine.'* *- (CAFFPREG) 'Caffeine intake more than 200 mg per day is not recommended during pregnancy or breastfeeding.'* • *When the maximum recommended daily dose of the medicine provides greater than 80 mg of total caffeine and the medicines is for internal use or oral application, the following warning statements are required on the label:* *- (CAFFLMT) 'Limit the use of caffeine-containing products (including tea and coffee) when taking this product.'* *- (CAFFCYP) 'Caffeine interacts with enzyme CYP1A2 in the liver. Consult your health professional before taking with other medicines' (or words to that effect)."*	- Paragraph 8(1)(k) of TGO 92 - Paragraph 11(1)(d) of TGO 92 - Clause 6 of TGO 92 for definition of 'warning statements' - Medicines Advisory Statements Specification 2017 and SUSMP (the Poisons Standard) - Schedule 2 Part 2 of the Regulations in relation to required representations - Schedule 4, Part 4, Division 2 of the Regulations – if the medicine was listed before 1 January 2016 - Schedule 4, Part 5, Division 3 of the Regulations– if the medicine was listed before 1 January 2016 - Schedule 4 – Current Regulations - Therapeutic Goods (Permissible Ingredients) Determination No.4 of 2018 for required warning statements linked to specific ingredients in newly listed medicines - Subsection 42DJ(2) of the Act in relation to required representations - TGA eBS Listed Medicines Validation Rules (accessed through Lotus Notes)	☐			
8a. Required pregnancy specific warning statement if the medicine is for oral use and	- Prescribing medicines in pregnancy database | Therapeutic Goods	☐			

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
contains active ingredient(s) included in Category B or C	Administration (TGA) medicines in pregnancy database' published on the TGA - Subclause 8(1)(ii) of TGO 92				
9. Batch No. (with correct prefix). • Please note: sponsors may provide labels that are not part of a released batch and, therefore, do not have the batch number or expiry date (or the prefix) included on the label. • Ensure that space is provided for the Batch No. and Expiry date.	- Paragraph 8(1)(f) of TGO 92 - Clause 6 of TGO 92 for definition of 'batch number' and 'batch number prefix' - Subclause 10(7) of TGO 92 for small containers - Subclause 10(8) of TGO 92 for individually wrapped goods - Subclause 10(9) of TGO 92 for blister packs	☐			
10. Expiry date (with correct prefix). • Please note: sponsors may provide labels that are not part of a released batch and, therefore, do not have the batch number or expiry date (or the prefix) included on the label. • Ensure that space is provided for the Batch No. and Expiry date. • Terms such as 'Best By' or words to this effect are not acceptable because they relate to foods. • For composite packs subclause 9(8)	- Paragraph 8(1)(g) of TGO 92 - Clause 6 of TGO 92 for definition of 'expiry date' and 'expiry date prefix' - Subclause 7(18) of TGO 69 Subclause 10(11) of TGO 92 for composite packs - Subclause 10(7) of TGO 92 for small containers - Subclause 10(8) of TGO 92 for individually wrapped goods - Subclause 10(9) of TGO 92 for blister packs - Subclause 9(8) of TGO 92 for composite packs	☐			
11. Storage conditions.	- Paragraph 8(1)(h) of TGO 92 - Subclause 11(4) of TGO 92	☐			
12. Directions for use (method, dose and frequency).	- Paragraph 8(1)(l) of TGO 92 Clause 6 of TGO 92 for definition of 'directions for use' - Paragraph 8(1)(m) of TGO 92 if the medicine requires some preparation before use - Subparagraph 8(1)(l)(ii) of TGO 92 if there is insufficient space on the label or primary pack and a package insert is provided	☐			

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
13. Name and contact details of sponsor/ distributor (only name or trademark required for blisters). • Note: Distributor details may not be on eBS but should include sufficient information to allow the Australian sponsor or distributer to be uniquely identified.	- Paragraph 8(1)(i) of TGO 92 - Clause 6 of TGO 92 for definition of 'name and contact details', 'distributor' and 'sponsor' - Subclause 10(7) of TGO 92 for small containers - Subclause 10(8) of TGO 92 for individually wrapped goods - Subclause 10(9) of TGO 92 for blister packs	☐			
14. Indications/Statement of goods • Intended purpose/indications/claims present and consistent with the ARTG record (condition of listing). • **This includes indications/statements on the website.**	- Paragraph 8(1)(n) of TGO 92 - Paragraph 28(5)(ab) of the Act	☐			
14a. The approved route of administration if the medicine is contained in an **ampoule**	- Subclause 8(1)(o) of TGO 92	☐			
15. AUST L (main label) – primary pack (or immediate container if no p/p).	- Subparagraph 7(2)(d)(i) of TGO 92 - Paragraph 15(1)(b) and (c) of the Regulations	☐			
16. For topical preparations only – name of any antimicrobial agents.	- Subclause 10(2) of TGO 92	☐			
16a. If the medicine is for **external use**, the statement "Caution: Not to be Swallowed" or "For External Use Only" or words to this effect	- Subclause 8(1)(i) of TGO 92	☐			
16b. Medicine Kits and composite pack requirements • **If you identify a deficiency, tick the relevant box above e.g. AAN incorrect, tick L3, etc.**	- Clause 6 of TGO 92 for the definition - Subclause 9(3) of TGO 92 - Subclause 9(8) of TGO 92 - Subclause 10(6) of TGO 92 - Subclause 10(11) of TGO 92				
General labelling requirements for above required particulars					
17. Legible, durable, **clearly visible** (not obscured) and strongly contrasted English language. • All information that is required by TGO 92 to be on the label must be in English.	- Paragraphs 7(2)(a), (b), (c) and (e) of TGO 92 - Paragraph 8(4) of TGO 92 - Paragraph 8(5) of TGO 92	☐			

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
• Other languages are allowed provided they are not misleading or breach the legislation. • Information on a delivery device					
18. Letter height of required particulars is ≥ 1.5 mm, AUST L ≥ 1mm. • Use the scaled magnifiers (with or without illumination) to measure letter height. • Scaled magnifiers are located in the LCS APS6 area.	- Paragraphs 7(2)(d) of TGO 92 - Clause 6 of TGO 92 for definition of 'text size' - Paragraph 15(1)(b) and (c) of the Regulations	☐			
18a. Information is in a colour or colours contrasting strongly with the background, except for: (i) the expiry date and expiry date prefix; and (ii) the batch number and batch number prefix when that information is embossed or debossed and not printed	- Paragraphs 7(2)(e) of TGO 92	☐			
Ingredient requirements					
19. Any quantity restrictions complied with. • e.g. Organic forms of Chromium, Vitamin A, KCl and Iron. • *When for internal use or oral application, the maximum recommended daily dose of the medicine must provide no more than 100 mg of caffeine from this ingredient.* • *When the medicine is packaged for supply as a divided preparation and is for internal use or oral application, the medicine must not contain a concentration of total caffeine greater than 33%.* • *When the medicine is packaged for supply as an undivided preparation and is for internal use or oral application, the medicine must not contain a concentration of total caffeine greater than 1%.* • *When the medicine is for internal use or oral application, a maximum recommended dose of the medicine must not provide more than*	- Therapeutic Goods (Permissible Ingredients) Determination No.1 of 2018 – 26BB List - SUSMP (the *Poisons Standard)* - Schedule 4, part 5, Division 2 of the Regulations - for medicines listed before 1 January 2016 - TGA eBS Listed Medicines Validation Rules (accessed through Lotus Notes)	☐			

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
100 mg of total caffeine within a 3 hour period. • *in divided preparations or undivided preparations for internal human therapeutic use when labelled with a maximum recommended daily dose of no greater than 600 mg of total caffeine*					
19a. Appropriate metric units	- Subclause 11(1) of TGO 92 - Subclause 11(2) of TGO 92	☐			
20. Expression of quantity/proportion – herbal ingredients.	- Paragraph 11(2)(i) of TGO 92	☐			
21. Expression of quantity/proportion – vitamin A.	- Subparagraph 11(2)(i)(iv) of TGO 92	☐			
22. Expression of quantity/proportion – minerals.	- Paragraph 11(2)(h) of TGO 92	☐			
23. Expression of quantity/proportion – biological organisms.	- Subparagraph 11(2)(i)(v) of TGO 92	☐			
24. Expression of quantity/proportion – homoeopathic products.	- Clause 6 of TGO 92 for definition of 'homoeopathic medicine', 'homoeopathic potency' and 'homoeopathic preparation' - Subclause 10(3) of TGO 92 - Subclause 10(4) of TGO 92 - Subclause 11(3) of TGO 92	☐			
24a. Expression of activity units of enzymes	- Subclause 11(2)(i)(iii) of TGO 92 - Schedule 3 of TGO 92	☐			
25. Ingredients are not included in a Schedule to the Poisons Standard or Appendix C of the Poisons Standard.	- Schedule 4, item 3 (c)(i) of the Therapeutic Goods Regulations 1990	☐			
Presentation and Advertising					
26. Webpage (where available) for the goods is compliant with the Therapeutic Goods Advertising Code?	- Therapeutic Goods Advertising Code (No. 2) 2018 - Paragraph 28(5)(ab) of the Act – if there are indications advertised on a webpage but not on the ARTG	☐			
27. Is the product eligible for listing? • i.e. the indications on the label **or** ARTG entry are not for the **treatment** of	- Ineligible for listing paragraph 30(1A)(a) of the Act	☐			

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
a disease, condition, ailment or defect specified in Part 4 of the Advertising Code? • Note: the condition does not need to be 'serious'. • Please check all indications on the ARTG.	- Schedule 4, Item 3 of the Regulations – if the medicine was listed before 1 January 2016 Therapeutic Goods Advertising Code (No. 2) 2018				
28. The indications on the label/name of medicine don't reference or imply reference to a **prohibited** condition (specified under the Code)? • Note: the indication must be 'advertised', the ARTG entry does **not** constitute an advertisement. • The label must be the actual label in use (not a draft) to be considered as part of presentation.	- Prohibited representation paragraph 30(2)(ea) of the Act Therapeutic Goods Advertising Code (No. 2) 2018	☐			
29. The indications on the label/name of medicine don't reference or imply reference to a **serious** condition under Part 4 of the Code? • Note: the indication must be 'advertised', and the ARTG entry does not constitute an advertisement. • The label must be the actual label in use (not a draft) to be considered as part of presentation.	- Restricted representations paragraph 30(2)(ea) of the Act - Definition of 'serious' in the Code Therapeutic Goods Advertising Code (No. 2) 2018	☐			
30. Name of goods is appropriate for a Listed medicine. • i.e. does not promote/promise a treatment/cure or sound similar to a Registered medicine.	- Subsection 3(5) and 16(1A) of the Act - Regulation 3A, Subregulation 11(1) and schedule 4 of the Regulations - The Code - Therapeutic Goods Advertising Code (No. 2) 2018	☐			
31. "Free from <ingredients>" claims are accurate (check PIs). • e.g. Maltodextrin may contain gluten. • Check extraction solvents for alcohols.	- Paragraph 4(2)(c) of the Code - Subsection 3(5) of the Act	☐			

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
32. Presentation of the medicine is not "unacceptable". • This includes misleading claims (based on lack of evidence). • Is not capable of being misleading or confusing as to content or proper use. • Does not state or suggest that the goods have ingredients, components or characteristics that they do not have. • Is the name the same as another therapeutic good that contains different ingredients?	- Definition of 'presentation' subsection 3(1) of the Act - Subsection 3(5) of the Act - Regulation 3A of the Regulations	☐			
33. Other text and graphics are acceptable.	- Unacceptable presentation under - Subsection 3(5) of the Act	☐			
34. Statements are consistent with general principles of the Code (all indications on the ARTG must be checked).	Therapeutic Goods Advertising Code (No. 2) 2018	☐			
35. Claims regarding vitamin or mineral supplementation are only permitted where the recommended daily dose of the product provides at least 25% of the RDI for that vitamin or mineral. • There shouldn't be reference to the presence of vitamins or minerals in the claim/indication unless they are present in the recommended daily dose of at least 10% of the RDI, unless there is evidence to support a therapeutic effect below this level.	- NHMRC Nutrient Reference Values - Therapeutic Goods Advertising Code (No. 2) 2018	☐			
36. No unacceptable endorsements, etc.	- Therapeutic Goods Advertising Code (No. 2) 2018	☐			
37. Does not refer to the Act or suggest or imply the goods are recommended or approved by any government body.	- Paragraph 42DL(1)(e)(ii) of the Act - Therapeutic Goods Advertising Code (No. 2) 2018	☐			
38. Does not refer to goods/substances/preparations in Schedules 3, 4 or 8 of SUSMP.	- Paragraph 42DL(1)(f) of the Act	☐			

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
39. Advertisement is unlikely to impact the consumer's ability to appropriately use the goods in line with their intended purpose. **the breach is not related to the lack of evidence.**	- Definition of 'presentation' subsection 3(1) of the Act - Subsection 3(5) of the Act - Regulation 3A of the Regulations	☐			
40. Advertisement is unlikely to impact the consumer's ability to safely use the goods **the breach is not related to the lack of evidence.**	- Definition of 'presentation' subsection 3(1) of the Act - Subsection 3(5)(d) of the Act - Regulation 3A of the Regulations	☐			
41. Advertisement is unlikely to lead to harm or risks public health. **the breach is not related to the lack of evidence.**	-	☐			
42. Permitted indications requirements https://www.legislation.gov.au/Details/F2019L00262 s22 [redacted]	Ineligible for listing paragraph 30(1A)(a) of the Act Schedule 4, Item 3 of the Regulations Therapeutic Goods (Permissible Indications) Determination (No.1) 2019	☐			

Requirement	Relevant legislation	Deficiency Identified	Pack Type 1	Pack Type 2	COMMENTS
43. Information included in the ARTG is correct s22 [redacted]	- The certification under paragraph 26A(2)(k) of the Act - Therapeutic Goods Act 1989	☐			
Food					
44. Goods, in the form in which they are presented, do not appear to have a tradition of use as a food.	- Subsection 3(1)of the Act for definition of a therapeutic good - Discuss with supervisor if appears to be a food - Food-Medicine Interface Guidance Tool, consult FMI Working Group - s22 [redacted]	☐			
45. Food standard applicable to the goods.	- Subsection 3(1)of the Act for definition of a therapeutic good - Chapter 2 of the Food Standards Code (FSANZ) – e.g. 2.6.4 (formulated caffeinated beverage), 2.9.3 (formulated meal replacement), etc.	☐			

Manufacturing

Relevant TRIM reference			
1. Reviewed by		Date	
2. Peer reviewed by	(if necessary)	Date	
3. Reviewed by Supervisor		Date	
Summary of issues to pursue in the P2C	s22 [redacted] (e,g, NA if no issues)		
Action	s22 [redacted]		
Grounds for cancellation s22 [redacted]			

s22 [redacted]

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
Product Manufacturer(s)				
1. Manufacturers included in the specifications/formulation documents are nominated in the ARTG entry and steps of manufacture are consistent.	- Paragraphs 26A(2)(h) and (i) of the Act - Paragraphs 28(5)(f) and (g) of the Act	☐		
2. Australian manufacturers included in the ARTG hold licences for the type of product, dosage form and the manufacturing steps that are nominated in the ARTG for the medicine.	- Paragraph 26A(2)(e) of the Act - Paragraph 28(5B)(a) of the Act - Manufacturers information database (MIS) in eBS	☐		

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
3. Sponsor holds a valid clearance certificate for any overseas manufacturers for the type of product, dosage form and manufacturing steps that are nominated in the ARTG for the medicine.	- Subsection 26A(3) of the Act - Paragraph 28(5B)(b) of the Act - Manufacturers information database (MIS) in eBS	☐		

Finished Product Details and Testing Specifications

The finished product specification is the set of tests and limits applicable to the finished medicinal product to ensure that every batch is of satisfactory and consistent quality at release and throughout its shelf life.

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
4. Product name and/or product code(s) present and capable of uniquely identifying the product.	- Consistent throughout documentation. - Often not exactly identical to name in ARTG entry. - e.g. "Healthy life super omega-3 concentrated fish oil" in ARTG entry may be "fish oil concentrated" in documentation. - s22 [redacted]	N/A		
5. Date specification approved, version number, name and signature of company official.	- s22 [redacted]	N/A		
6. Dosage form (*stated and consistent with ARTG*). • Separate and distinct goods?	- Paragraph 16(1A)(c) of the Act	☐		
7. Description of the physical appearance of the product. • Consistent with Certificate of Analysis?	- s22 [redacted]	N/A		
8. Description of pack/container size(s) and closure system. • *Applicable for certain iron-containing and essential oil products.*	- *TGO 95 – Child-resistant packaging requirements for medicines* - SUSMP (the *Poisons Standard)*	☐		
9. Recommended storage conditions included on finished product specification document. • Must be consistent with the label and TGO 69 requirements, and appear acceptable; e.g. probiotics normally stored at 2 – 8°C.	- Paragraph 8(1)(h) of TGO 92Subclause 11(4) of TGO 92	N/A		

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
10. Shelf-life included on finished product specification document (maximum five years in final container). • If the shelf-life is not present, it would suggest that stability data does not exist or stability testing may not have been performed.	- Clause 6 of TGO 92 for definition of 'expiry date' - s22 [redacted]	N/A		
Tests and limits for the finished dosage form are acceptable and consistent with relevant default standards, TGOs, and TGA guidelines. Specific tests are listed below Part 3-1 of the Act – Standards Section 13(2) of the Act (TGOs take precedence over pharmacopoeias) Subsection 26A(2)(d) of the Act TGO 78 – *Standard for tablets and capsules* *TGO 98 – Microbiological standards for medicines* British Pharmacopoeia (BP) *Available online via the Information Resources Catalogue (library)* European Pharmacopoeia (PH Eur) *Available online via the Information Resources Catalogue (library)*	United States Pharmacopoeia – National Formulary (USP-NF) *Available online via the Information Resources Catalogue (library)* BP Volume III – Formulated Preparations: Specific Monographs BP Volume III – Formulated Preparations: General Monographs: *Please see Attachment 1 for all dosage forms* BP Volume IV – Herbal Drugs, Herbal Drug Preparations and Herbal Medicinal Products BP Volume IV – Materials for use in the Manufacture of Homoeopathic Preparations BP Volume V – Appendices *Please see Attachment 2 for relevant tests and assays*			
11. For a finished product with an applicable monograph in a default standard – complies with relevant tests and limits (as outlined above).	- Paragraph 8(a) of TGO 78 for tablets or capsules with an individual BP monograph - Paragraph 26A(2)(d) of the Act - BP Volume III – Formulated Preparations: Specific Monographs - USP – NF monographs - PH-Eur monographs	☐		
12. Uniformity of weight for tablets, capsules.	- Paragraph 8(a)(i) of TGO 78 for tablets and capsules with an individual BP monograph - Paragraph 10(b)(a) of TGO 78 for tablets and capsules without an individual BP monograph - Paragraph 26A(2)(d) of the Act - BP Volume V – Appendix XII C. Consistency of Formulated Preparations. 1.Uniformity of Weight (Mass)	☐		

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
	- BP Volume III – Formulated Preparations: Specific Monographs. - BP Volume III - Formulated Preparations: General Monographs. Capsules - BP Volume III – Formulated Preparations: General Monographs. Tablets			
13. Uniformity of weight (mass) of delivered doses from multidose containers. • This is applicable to oral dosage forms such as granules, powders or liquids which are supplied in multidose containers and include a measuring device; e.g. droppers. • **N.B.** Not applicable/enforceable if manufacturer is using USP method to measure uniformity of weight.	- Part 3-1 of the Act – Standards - Paragraph 26A(2)(d) of the Act - BP Volume V – Appendix XII C. Consistency of Formulated Preparations. 2. Uniformity of Weight (Mass) of Delivered Doses from Multidose Containers.	☐		
14. Disintegration of tablets, capsules.	- Part 3-1 of the Act – Standards - Paragraph 26A(2)(d) of the Act - Paragraph 10(d) of TGO 78 for tablets or capsules without an individual BP monograph - BP Volume III - Formulated Preparations: General Monographs. Capsules - BP Volume III – Formulated Preparations: General Monographs. Tablets - BP Volume V Appendix XII A. Disintegration.	☐		
15. Dissolution: • tablets and capsules containing 100 mcg or more folic acid. • Modified-release tablets and capsules.	Folic acid: - Section 9 of TGO 78 - Paragraph 26A(2)(d) of the Act - USP-NF Chapter <2040> 'Disintegration and Dissolution of Dietary Supplements' Modified releases: - Paragraph 10(c) of TGO 78 - BP Volume III - Formulated Preparations: General Monographs. Capsules - BP Volume III – Formulated Preparations: General Monographs. Tablets - BP Volume V Appendix XII B. Dissolution	☐		
16. Assay for the content of preservative.	- Not a mandatory test but good quality control.	☐		

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
• Only applicable to liquid or semi-solid preparations especially with high water content.	- Where a liquid or semi-solid preparation, especially with a high water content, does not assay for content of preservative, it *may* in some circumstances be worth considering for routine microbiological testing. - Multidose medicines may have anti-microbial agents that may require preservative efficacy testing. Please see Clause 10 of TGO 100.			
17. Microbial attributes of a complementary medicine **oral dosage form** containing raw material of natural (animal, vegetal or mineral) origin.	- Subsection 11(2) of TGO 100 - Schedule 1 of TGO 100 - Schedule 2 of TGO 100 for herbal medicines to which boiling water is added before use (i.e. tea) - Paragraph 26A(2)(d) of the Act	☐		
18. Microbial attributes of a non-sterile medicine (other than above).	- Subsection 11(1) of TGO 100 - Paragraph 26A(2)(d) of the Act - BP Volume V– Appendix XVI D – Table 5.1.4.-1 - USP-NF Chapter <1111> Microbiological Examination of Nonsterile Products. Table 1 – Acceptance Criteria	☐		
19. Other testing as required (describe).	- BP Volume V – Appendices *Please see Attachment 2 for relevant tests and assays*	☐		
20. Stability data (if reviewed) supports the claimed shelf life and storage conditions	- Technical guide on the interpretation of PIC/S guide - Stability testing of Listed complementary medicines	☐		
21. The finished product does not contain a prohibited substance e.g. aristolochic acid.	- Schedule 9 or 10 of SUSMP (the *Poisons Standard)*	☐		
22. Fraud, misrepresentation, falsification of data, intentional or reckless contravention of listing requirements is unlikely. **Based on the information reviewed and/or signals from other areas.**	-	☐		

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS

Formulation document

This section is used to check the requirements in the Formulation documentation also known as 'active ingredient details'.

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
23. Details of full product formulation present and consistent with the ARTG entry. • Each active ingredient and equivalent quantities must be able to be identified as correct for the purposes of verification against the product's label, ARTG and eligibility for listing requirements.	- Separate and distinct goods - Paragraphs 16(1A)(a) and (b) of the Act for different active ingredients and their quantities. - You may consider Paragraph 26A(2)(k) of the Act.	☐		
24. All excipient ingredients, including any coating and capsule shell ingredients consistent with the ARTG entry. • Where the formulation includes a PI, confirm the PI number and, where relevant, that the quantity of PI is consistent with the ARTG entry.	- Separate and distinct goods - Paragraph16(1A)(d) of the Act and Paragraph 11(1)(c) of the Regulations for different excipients	☐		
25. Herbal ingredients including the botanical species, plant part and preparation type. • For extracts: – the amount of extract; – strength of extract (extraction ratio); – equivalent amount of dried or fresh plant; – extraction solvents; and – diluting medium (carrier).	- eBS Listed Medicines Validation Rules for naming conventions - TGA approved terminology for medicines/herbal ingredients	☐		
26. Quantification of active ingredients in the finished product. - Only for caffeine and other active ingredients containing caffeine • Analysis in each batch or on rotation: – satisfactory limits are applied, any overages specified are compatible with statutory limits. – 'restricted' ingredient(s) assayed in each batch (*unless justified*).	- Section 8 of TGO 78 for tablets or capsules with an individual BP monograph. - BP Volume III – Formulated Preparations: Specific Monographs. - Paragraph 10(b) of TGO 78 for tablets or capsules without an individual BP monograph. - Schedule 1 of TGO 78 for Limits for content of each active ingredient or component in a listed good that is a tablet or capsule.	☐		

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
• Quantified by input (QBI).	- Subregulation 11(2) of the Regulations for restricted ingredients.			

Certificate of Analysis

The Certificate of Analysis is a quality control document that confirms that the product meets its product specification. The test data should be accompanied by the acceptable test specifications, normally referenced, which the batch must comply with before release for supply.

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
Product name/product identification.	- Product name and/or product code(s) present and capable of uniquely identifying the product. - Consistent throughout documentation. - Often not exactly identical to name in ARTG entry. - e.g. "Healthy life super omega-3 concentrated fish oil" in ARTG entry may be "fish oil concentrated" in documentation. - Include in manufacturer's spreadsheet if there is an issue.	N/A		
Date and batch number present.	- s22 [redacted]	N/A		
Name of manufacturer present and nominated on ARTG for **manufacture of dosage form** OR **release for supply** manufacturing steps. **If a deficiency is identified, tick the relevant box in the previous section(s)**	- Paragraphs 26A(2)(h) and (i) of the Act - Paragraphs 28(5)(f) and (g) of the Act - Paragraph 26A(2)(e) of the Act - Paragraph 28(5B)(a) of the Act - Manufacturers information database (MIS) in eBS - Subsection 26A(3) of the Act - Paragraph 28(5B)(b) of the Act	N/A		
Description of the physical appearance of the product. • Consistent with Product Specifications. • Dosage form consistent with the ARTG entry.	- Include in manufacturer's spreadsheet if there is an issue R11/149775. - Paragraph 16(1A)(c) of the Act	N/A		
Physical test – uniformity of weight (see TGO 78) – for tablets and capsules.	- Paragraph 8(a)(i) of TGO 78 for tablets and capsules with an individual BP monograph	N/A		

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
If a deficiency is identified, tick the relevant box in the previous section(s)	- Paragraph 10(b)(a) of TGO 78 for tablets and capsules without an individual BP monograph - Paragraph 26A(2)(d) of the Act			
Physical test – Disintegration time (see TGO 78) – for tablets and capsules. **If a deficiency is identified, tick the relevant box in the previous section(s)**	- Part 3-1 of the Act – Standards - Paragraph 26A(2)(d) of the Act - Paragraph 10(d) of TGO 78 for tablets or capsules without an individual BP monograph	N/A		
Dissolution test required for: • tablets and capsules containing 100 mcg or more folic acid. • modified release tablets and capsules. • NA where not applicable. **If a deficiency is identified, tick the relevant box in the previous section(s)**	Folic acid: - Section 9 of TGO 78 - Paragraph 26A(2)(d) of the Act - USP-NF Chapter <2040> 'Disintegration and Dissolution of Dietary Supplements' Modified releases: - Paragraph 10(c) of TGO 78 - BP Volume III - Formulated Preparations: General Monographs. Capsules - BP Volume III – Formulated Preparations: General Monographs. Tablets - BP Volume V Appendix XII B. Dissolution	N/A		
Quantitative analysis for active ingredients / ingredient components / preservatives (if applicable) - Only for caffeine and other active ingredients containing caffeine ***OR*** QBI (do not pursue unless restricted ingredients close to limit – assess the need to pursue with supervisor). **If a deficiency is identified, tick the relevant box in the previous section(s)**	- Section 8 of TGO 78 for tablets or capsules with an individual BP monograph. - BP Volume III – Formulated Preparations: Specific Monographs. - Paragraph 10(b) of TGO 78 for tablets or capsules without an individuzal BP monograph. - Schedule 1 of TGO 78 for Limits for content of each active ingredient or component in a listed good that is a tablet or capsule. - Subregulation 11(2) of the Regulations for restricted ingredients	N/A		
Microbial assays. • Regular assay may not be required for all complementary medicines. • However, particular attention should be paid to products that are liquid and semi-solid preparations.	- Clause 10 of TGO 100 – for multidose medicines - Subsection 11(2) of TGO 100	N/A		

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
If a deficiency is identified, tick the relevant box in the previous section(s)				
Name and signature of appropriate official present.	- s22 [redacted]	N/A		
Any other notable issues relating to manufacturer added to spreadsheet.	- s22 [redacted]	N/A		

Starting Material Specifications

This section is only required to be completed when reviewing raw material specifications, which are not always requested.

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
Material suitably characterised prior to formulation: • Herbal ingredients include: – botanical species; – plant part; and – preparation type. • For extracts: – the amount of extract; – strength of extract (extraction ratio); – equivalent amount of dried plant; – extraction solvents; and – diluting medium (carrier). **If a deficiency is identified, tick the relevant box in the previous section(s)**	- eBS Listed Medicines Validation Rules for naming conventions	N/A		
Raw material complies with relevant default standard, or compositional guideline or material otherwise satisfactorily identified. Raw material testing establishes an ingredient profile and demonstrates that it is the same ingredient that has been approved for use in Listed complementary medicines,thereby ensuring the quality and safety of the medicine. **If a deficiency is identified, tick the relevant box in the previous section(s)**	- Part 3-1 of the Act – Standards - Paragraph 26A(2)(d) of the Act Compositional guidelines: - http://www.tga.gov.au/industry/cm-cg.htm - British Pharmacopoeia (BP) - European Pharmacopoeia (PH Eur) - United States Pharmacopoeia – National Formulary (USP-NF)	N/A		
Assay of components: • 'restricted' and mandatory components. – Oxedrine: maximum daily (max. 30 mg.)	- eBS Listed Medicines Validation Rules	N/A		

Requirement	Relevant Legislation	Deficiency Identified		COMMENTS
– Alkaloids – Vitamin A from Retinyl palmitate – Identification Test **B** for Ginkgo biloba extracts (USP32-NF27) – Aristolochic acids (**must confirm the absence or be below current detection limits**). • When components are claimed on the label. Examples: DHA & EPA in Fish Oils.	- SUSMP (the *Poisons Standard)* or other restrictions applicable to Listed complementary medicines - Therapeutic Goods (Permissible Ingredients) Determination No.1 of 2015 – 26BB List **If a deficiency is identified, tick the relevant box in the previous section(s)**			

Attachment 1 – General monographs for dosage forms

BP Volume III – Formulated Preparations: General Monographs

- Capsules
- Liquids for Cutaneous Application
- Ear Preparations
- Eye Preparations
- Granules
- Preparations for Inhalation
- Oral Liquids
- Nasal Preparations
- Oromucosal Preparations
- Oral Powders
- Topical Powders
- Rectal Preparations
- Topical Semi-solid Preparations
- Sticks
- Spirits
- Tablets
- Transdermal Patches
- Vaginal Preparations

Attachment 2 – Relevant tests and assays

BP Volume V – Appendices

APPENDIX X

J. Determination of Cineole
K. Determination of Aldehydes
M. Essential Oils
N. Fixed Oils
P. Oils Rich in Omega-3-acids

APPENDIX XI

E. Essential Oils in Herbal Drugs
G. Complete Extraction of Alkaloids
M. Tannins in Herbal Drugs
R. Test for Aristolochic Acids in Herbal Drugs
S. Determination of Mycotoxins in Herbal Drugs
T. Herbal Drugs: Sampling and Sample Preparation
U. Microscopic Examination of Herbal Drugs

APPENDIX XII

A. Disintegration
B. Dissolution
C. Consistency of Formulated Preparations

APPENDIX XVI

B. Microbiological Examination of Non-sterile Products
C. Efficacy of Antimicrobial Preservation
F. Microbiological Examination of Herbal Medicinal Products for Oral Use
G. Microbiological Quality of Herbal Medicinal Products for Oral Use

Evidence

Relevant TRIM reference			
1. Reviewed by		Date	
2. Peer reviewed by	(if necessary)	Date	
3. Reviewed by Supervisor		Date	
Summary of issues to pursue in the P2C	(e,g, NA if no issues)		
Action	s22 [redacted]		
Grounds for cancellation s22 [redacted]			

s22 [redacted]

Indication Evaluation

Use this table to record whether an indication is supported based on the evidence evaluation table below

Indication(s)*	Scientific/Traditional Specific/Non-specific	Outcome
*Copy/paste the standard and specific indications from the ARTG entry Add the indications on the label if they are different. *Related indications can be grouped together such as 'cardiovascular' provided they require the same level of evaluation.*	Specify the type of evidence to assist in knowing the appropriate quality of evidence required in the evidence guidelines.	Supported / Unsupported (May be useful to include evidence reference numbers (below)).
1.		
2.		
3.		
4.		
5.		
6.		
7.		
…		
…		
…		
…		
…		
The value of the 'Indication Outcome' is = to the number of unsupported indications.		**Indication Outcome:**

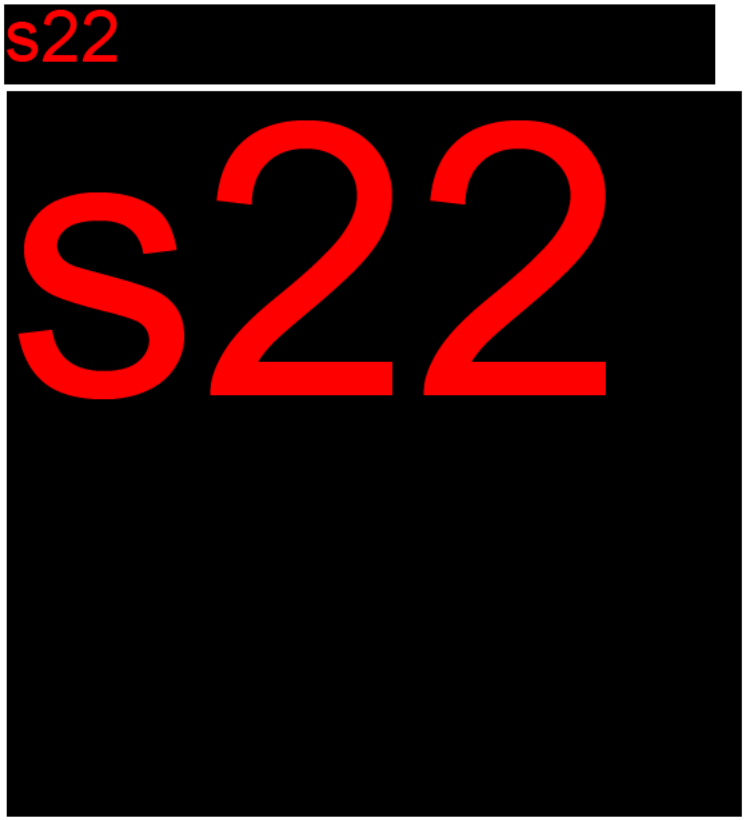
Evidence Evaluation

Use this table to provide a summary of the evidence provided and an assessment against the product indications (above).

Statistics – Useful reference when evaluating statistics https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3444174/

#	Reference	Summary	Assessment
Enter Ref. #	Enter reference details.	**Type:** RCT/Monograph/Evidence Based Textbook/etc. **Aim:** **Population:** • Healthy / Diseased • Target: Adult/Children • Gender: Male vs Female • Age: x – y Years • Race/Ethnicity: **Inclusion/Exclusion Criteria:** **Dose Regimen**: x mg [Drug], [Frequency] **Dosage Form**: Tablet, capsule etc. **R.O.A.**: oral, etc. **Statistics:** • Sample size (n) • Power • Effect size **Conclusion**: Outcome	**Evidence**: Primary / Secondary **Assessment:** I find that…. **Limitations:** - Only in male adults - Population Size - Etc. **Sponsor Proposed Indications:** The sponsor has proposed that the following indications are supported: ➢ 1,2,3,4,5 **Indication(s) Supported:** I conclude that the following indications are supported: ➢ 1,2,3
Enter Ref. #	Enter reference details.	…	…

s22



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