Australian Government
Department of Health
Therapeutic Goods Administration

Proposed changes to Required Advisory Statements for Medicine Labels (RASML): Mometasone

Consultation paper

Version 1.0, July 2021

TGA Health Safety Regulation

Confidentiality
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Introduction

Purpose

The Therapeutic Goods Administration (TGA) is seeking comments from interested parties on proposed new advisory statements for labels of over the counter (OTC) medicines containing mometasone in dermal and nasal spray preparations, for inclusion in the Required Advisory Statements for Medicine Labels (RASML). The proposal to include advisory statements for mometasone-containing medicines in RASML follows recent down-scheduling of mometasone for dermal use when supplied under specific conditions, from Schedule 4 to Schedule 3 of the Poisons Standard.

Background

Advisory statements

Consumers rely on information from their health practitioner, pharmacist and medicine label in order to use medicines safely and effectively. However, the enhanced access and availability of OTC medicines means that consumers may not always receive comprehensive advice from a practitioner or pharmacist.

In the context of self-medication, the medicine label is the primary source of information for the consumer; so the label must contain the directions and advisory statements that are needed for safe and effective use of these medicines.

The TGA Labelling Orders require medicine labels to include 'warning statements' where these apply to the medicines, including any advisory statements specified in the instrument made under subsection 3(5A) of the *Therapeutic Goods Act 1989* ('the Act'), as in force from time to time.

The Required Advisory Statements for Medicine Labels (RASML)

The RASML is registered on the Federal Register of Legislative Instruments under subsection 3(5A) of the Act, as the Therapeutic Goods (Medicines Advisory Statements) Specification 2019 ('the Specification'). The RASML sets out advisory statements that are required to be included on the labels of specified OTC and registered complementary medicines.

The most recent version of the Specification is the Therapeutic Goods (Medicines Advisory Statements) Specification 2019, which comprises RASML No. 5. The transition period for compliance with RASML No. 5 ended on 31 August 2020 and labels must now comply with the advisory statements specified in RASML No. 5.

Finalised advisory statements for mometasone would be included in the next version, RASML No. 6. A transition period of 18 months from commencement of the new RASML is provided to allow for existing medicines that do not already comply with new requirements to have their labelling updated.

The advisory statements required by the RASML are designed to inform consumers about specific risks related to the use of medicines that have been identified during development and evaluation of new medicines, or subsequent pharmacovigilance activities, testing, adverse event reports or from other scientific or clinical information.

The RASML permits the wording of the actual statements that are included on medicine labels to differ from the wording set out in the RASML, as long as the intent is the same.

Scheduling of mometasone in the Poisons Standard

Mometasone nasal spray has been available as an OTC medicine since 2000 and was down-scheduled from S3 to S2 in the Poisons Standard in 2003. The S2 entry for mometasone is as follows:

> *MOMETASONE in aqueous nasal sprays delivering 50 micrograms or less of mometasone per actuation when the maximum recommended daily dose is no greater than 200 micrograms for the prophylaxis or treatment of allergic rhinitis for up to six months in adults and children 12 years of age and over.*

Mometasone for dermal use was down-scheduled from S4 to S3 from 1 June 2020 with inclusion of the following S3 entry in the Poisons Standard:

> *MOMETASONE as the only therapeutically active substance in preparations for dermal use containing 0.1 per cent or less of mometasone in packs containing 15 g or less.*

Proposed RASML statements for mometasone

There are currently no RASML warning statements for mometasone. Given the recent down-scheduling of mometasone in preparations for dermal use from Schedule 4 to Schedule 3 in the Poisons Standard, RASML warnings for these medicines are proposed. Warnings are also proposed for OTC mometasone-containing nasal sprays.

Dermal preparations

Proposed RASML warnings for OTC medicines containing mometasone for dermal use are shown in the table below. The basis for each warning is included in the table.

Warning statement	Basis for warning
Do not use:	
• on skin infections (e.g. cold sores, shingles, chicken pox, thrush, tinea, ringworm)	Contraindicated in fungal and most viral infections of the skin, as specified in the approved Product Information (PI) for mometasone dermal preparations
• ulcerous skin	Approved PI
• for acne	Consistent with RASML warnings for clobetasone and hydrocortisone
• in or around the eyes	Approved PI states “not for ophthalmic use”. Could be inappropriately used for eyelid dermatitis, risking steroid-induced atrophy
• if you are sensitive to any corticosteroids	Approved PI

Warning statement	Basis for warning
Unless a doctor has told you to, do not use:	
• on the face	High potency corticosteroids, such as mometasone, should generally not be applied to the face, as there is an increased risk of steroid-induced rosacea (perioral dermatitis). [Australian Pharmaceutical Formulary (APF 25 Online)]. Contraindicated for use in rosacea (Approved PI)
• on large areas of the skin	Systemic absorption of topical corticosteroids will be increased if extensive body surface areas are treated (Approved PI)
• on skin areas that rub together	Greatest potential for absorption occurs from flexures, and high potency preparations are best avoided in these areas unless symptoms do not respond to treatment [Australian Pharmaceutical Formulary (APF 25 Online)]
• under a bandage, dressing, nappies or plastic pants	Approved PI
• if you are pregnant, likely to become pregnant, or breastfeeding	Approved PI. The wording "likely to become pregnant" is consistent with the pregnancy warning required by Therapeutic Goods Order 92 for oral products.
• for children under 12 years old	Clobetasone (a moderately potent corticosteroid) includes this warning statement in RASML. Children are more susceptible to adverse effects of corticosteroids (Approved PI).
If irritation occurs, discontinue use and seek medical advice	The approved PI states "If irritation or sensitisation develops, treatment should be discontinued and appropriate therapy instituted."
Seek medical advice if there is no improvement in symptoms after using for 1 week	Lack of improvement after 1 week would tend to indicate a more serious condition requiring further assessment and modified treatment. Prolonged use is associated with increased risk of adverse reactions.
Do not use for more than 7 days unless a doctor has told you to.	Consistent with required RASML warnings for hydrocortisone (a mildly potent corticosteroid) and clobetasone (a moderately potent corticosteroid). Mometasone is a potent corticosteroid and prolonged use is associated with increased risk of adverse reactions.

In summary, the following RASML entry for mometasone-containing dermal preparations is proposed:

Column 1 Substance(s)	Column 2 Conditions	Column 3 Required statement(s)
Mometasone *(Entry 1 of 2)*	In preparations for dermal use	• Do not use: - in or around the eyes - for acne - on skin infections (eg. cold sores, shingles, chicken pox, thrush, tinea, ringworm) or ulcerous skin - if you are sensitive to any corticosteroids • Unless a doctor has told you to, do not use: - on the face, large areas of the skin, or areas that rub together - under a bandage, dressing, nappies or plastic pants - for more than 7 days - if you are pregnant, likely to become pregnant or breastfeeding - for children under 12 years old • If irritation occurs, discontinue use and seek medical advice. • Seek medical advice if there is no improvement in symptoms after using for 1 week.

Nasal spray preparations

Proposed RASML warnings for mometasone-containing nasal sprays are essentially based on those specified in the ARGOM Appendix 5 guideline on 'Corticosteroid nasal sprays', which states the following:

> Information consistent with the following should be included either on the product label or in a package insert (e.g. in the CMI, if it is provided as a package insert):
>
> - *Do not exceed the maximum stated dose.*
> - *A lower maintenance dose should be used once full effect is obtained.*
> - *Do not use for more than 6 months without the advice of your doctor or pharmacist.*
> - *See your doctor or pharmacist before using this product if:*
>   - *you have a nasal or sinus infection*
>   - *you have recently had an injury or surgery to your nose*
>   - *you have ulceration in your nose*
> - *See your doctor or pharmacist if:*
>   - *symptoms are not relieved within 7 days*
>   - *your nose bleeds*
>   - *you develop signs or symptoms of a nasal or sinus infection such as fever, pain or swelling, or discoloured nasal discharge*
>   - *you have eye pain or visual disturbances.*
>
> Where this information is included in the CMI or other package insert, the label is required to include a statement such as:
>
> - *Read the enclosed CMI/leaflet before starting to use this product.*

While the above ARGOM guideline allows for inclusion of required warnings in a package insert rather than on the label, there is no such provision for RASML warnings, which must be included on the product label. Nevertheless, currently registered mometasone nasal sprays include all or almost all of the required warnings on carton labelling. It is considered appropriate that these be required on carton labelling, as would be the case if specified in RASML. As RASML warnings, these would be exempt from inclusion on container labels for containers less than 25 mL (all currently registered containers, based on maximum 140 spray container size).

Existing approved labels for mometasone nasal sprays include variations on the above ARGOM-specified statement of "A lower maintenance dose should be used once full effect is obtained" (eg. "Once symptoms are controlled, reduce to 1 spray/nostril"). This information is considered to be a direction rather than a warning and such a statement is not proposed for inclusion in RASML.

Current products include a warning to consult a pharmacist or doctor before use if pregnant, consistent with information in approved PI documents. Accordingly, a pregnancy warning is proposed for inclusion in RASML.

Most current products do not contain any reference to breastfeeding on the label, but many pack inserts state that use in breastfeeding is not recommended. Approved Product Information refers to lack of available data. Given uncertainly, a warning to seek advice from a doctor or pharmacist if breastfeeding is proposed for inclusion in RASML.

The following RASML entry for mometasone-containing nasal spray preparations is therefore proposed:

Column 1 **Substance(s)**	**Column 2** **Conditions**	**Column 3** **Required statement(s)**
Mometasone *(Entry 2 of 2)*	In nasal spray preparations	• Do not exceed the maximum stated dose. • Do not use for more than 6 months without the advice of your doctor or pharmacist. • See your doctor or pharmacist before using this product if: - you have a nasal or sinus infection - you have recently had an injury or surgery to your nose - you have ulceration in your nose - you are pregnant or likely to become pregnant or are breastfeeding • See your doctor or pharmacist if: - symptoms are not relieved within 7 days - your nose bleeds - you develop signs or symptoms of a nasal or sinus infection such as fever, pain or swelling, or discoloured nasal discharge - you have eye pain or visual disturbances.

Consultation questions and responses

The TGA is requesting comments that will help ensure that the proposed advisory statements are appropriate and support the quality use of the medicines and that any label changes that would be required for these medicines are made in the most convenient, efficient and cost-effective way.

Submissions must be relevant to warning statements for OTC medicines containing mometasone and must be received by the closing date.

Question

Do you support the proposed conditions and wording of the advisory statements?

If there are aspects you do not support, please explain why you do not support them. You may make suggestions for alternative wording or additional statements that you think are suitable.

You may wish to include an assessment of how the proposed changes will impact on you; that is, what do you see as the likely benefits or costs to you (these may be financial or non-financial).

To provide your feedback click 'Make a submission' on the consultation page and include your response using the free text field and/or file upload function.

All feedback will be considered after the consultation period ends and will be published on the TGA website with your consent.

Version history

Version	Description of change	Author	Effective date
V1.0	Original publication	OTC Medicines Evaluation Section	July 2021

Therapeutic Goods Administration

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Reference/Publication #