

15 August 2017

Glaxosmithkline Consumer Health Care New Zealand Limited
C/o Bird & Bird
Lawyers
Level 11 68 Pitt Street
Sydney NSW 2000
Australia

By Email: lynne.lewis@twobirds.com

Dear Directors

**Glaxosmithkline Consumer Health Care New Zealand Limited - Fair Trading Act 1986:
Warning – twin products**

1. The Commerce Commission (the **Commission**) has been investigating the distribution and marketing of certain Voltaren and Panadol branded products in New Zealand by Glaxosmithkline Consumer Health Care New Zealand Limited (**GSK NZ**) under the Fair Trading Act 1986 (the **Act**).
2. Specifically, we have investigated the Voltaren and Panadol products pairs below (together called **the products**) each of which contain the same ingredients:
 - 2.1 Voltaren Emulgel / Voltaren Osteo Gel;
 - 2.2 Panadol Osteo Caplets / Panadol Back & Neck Long Lasting;
 - 2.3 Panadol Rapid / Panadol Back & Neck Pain Relief; and
 - 2.4 Panadol Cold & Flu Max + Decongestant / Panadol Sinus Pain & Congestion Relief.
3. We have now completed our investigation and are writing to warn you that the packaging and marketing for the products were likely to have breached sections 10 and/or 13(e) of the Act.
4. Section 10 of the Act prohibits traders from engaging in conduct that is liable to mislead the public as to the nature or characteristics of goods or their suitability for a purpose.

5. Section 13(e) of the Act prohibits traders from making false or misleading representations that goods have performance characteristics, uses or benefits.
6. GSK NZ does not consider it has breached the Act but has advised that since the investigation began, it has discontinued three of the products (Panadol Back & Neck Long Lasting, Panadol Back & Neck Relief and Panadol Sinus & Congestion Relief) and that the packaging for Voltaren Osteo Gel and parts of the Voltaren website that relate to Osteo Gel have been amended to include the statement "Same effective formula as Emulgel".

The investigation

7. GSK NZ cooperated fully with the Commission and supplied information and product packaging in relation to the distribution and sales in New Zealand of the products and originating products including documents in relation to the history of relevant Medsafe approvals.
8. The investigation showed that each of the products has the same active ingredients but have been marketed for different therapeutic purposes.
9. We have investigated whether specific representations made by GSK NZ, on packaging and in advertising (including website advertising) for the products created the overall impression that the specific product:
 - 9.1 had been specially formulated for the purpose stated on the product packaging; and/or
 - 9.2 was more effective for treating the named purpose of the product than the originating product; and/ or
 - 9.3 was solely effective in treating the pain state named on packaging for the product.
10. Copies of the packaging with representations for the products and originating products investigated are at **Attachment A**.

Voltaren Emulgel / Osteo Gel

11. Emulgel and Osteo Gel are sold as two separate topical gel products but have identical ingredients.
12. Emulgel is marketed for general inflammation of the muscles, joints, tendons and ligaments due to injury, as well as back, neck and shoulder pain. Osteo Gel is marketed specifically for occasional pain and inflammation in mild forms of osteoarthritis of the knees and fingers.
13. Our investigation confirmed that Osteo Gel is identical to Emulgel.

Packaging

14. We identified aspects of the Osteo Gel packaging which in our view was likely to create the impression that Osteo Gel had been specifically formulated to treat mild forms of osteoarthritis of the knees and fingers, and was more effective or solely effective in treating mild forms of osteoarthritis of the knees and fingers than other products including Emulgel. This impression was likely to be created by:
- The reference to “Osteo” in the name of the product.
 - Statements on the front and back of the product that it is “for the temporary relief of local pain and inflammation associated with mild forms of osteoarthritis of the knees and fingers”.
 - The stylised picture of a knee joint on the packaging.
 - The sale of Osteo Gel in different pack sizes with different price points to Emulgel. This may have added to the impression that Osteo Gel is a different and more specialised product than Emulgel.
15. The potentially misleading impression given by the original packaging was compounded when Osteo Gel was contrasted with the packaging for Emulgel which did not refer to osteoarthritis as a specific indication on its packaging and only referred to “soft tissue rheumatism” on the back of the product in small print. There was no reference to osteoarthritis on the Emulgel packaging leaflet insert.
16. If consumers purchased both products or read the information for each they were likely to form the view that the products were different and that they treated different ailments.

Website

17. The content of the Voltaren website at www.voltaren.co.nz was also likely to give the impression that Osteo Gel is a specialised product. Copies of the relevant website pages are at **Attachment B**. The website stated in respect of Osteo Gel that:
- It provided “targeted relief for mild forms of osteoarthritis”.
 - That “the patented technology in Voltaren Osteo Gel helps the gel to penetrate deeply into the skin to enhance delivery of diclofenac to the site of pain”.
18. The website also provided different information about Emulgel that reinforced the impression that both Emulgel and Osteo Gel were targeted products with special indications. For example it stated:
- “Voltaren Emulgel – Targeted relief for muscle strains and sprains”.

- “Targeted relief right where you need it”.
 - Emulgel “is used to treat inflammation of muscles, joints, tendons and ligaments, due to trauma (e.g. sports injuries, sprains and strains), soft tissue rheumatism and localised rheumatic conditions (e.g. bursitis, aches and pains).”
 - “the Emulgel technology helps the gel to penetrate deeply into the skin to enhance delivery of diclofenac to the site of pain”.
19. During the period of the Commission’s investigation, GSK NZ amended the Osteo Gel product page of the Voltaren website to include the statement “same effective formula as Emulgel” and removed the reference to “targeted relief for mild forms of osteoarthritis”. GSK NZ amended the product comparison page to remove any reference to Osteo Gel, and to only refer to the new Osteo Gel 12 Hourly, which is double the strength of Emulgel/ Osteo Gel.

Advertising

20. Advertising for Osteo Gel may have also created a misleading impression:
- 20.1 The original television commercial aired in 2011, as part of the Family Health Diary advertorial, described Osteo Gel as a ‘new’ product. Only the packaging of the product was new at the time, as Emulgel had been on the market since 1991 as a prescription only medicine, and from 2006 as a general medicine.
- 20.2 In a launch advertorial in the print edition of the Family Health Diary from November to December 2011, Osteo Gel was also described as a “new treatment”. This advertisement also made the statement that “Voltaren Osteo Gel’s targeted action has been shown to reach therapeutic levels at the site of pain, providing clinically significant improvement in pain after one week”.
- 20.3 Osteo Gel was widely promoted between 2011 and 2015 including television advertisements referring to it exclusively as a treatment for osteoarthritis.
21. The representation in 2011 that Osteo Gel was a ‘new product’ is particularly concerning. The product was new if ‘product’ means packaging and ‘get up’. But the formulation was the same as Emulgel which had been on the market since 2006 for general sale. In our view consumers were likely to have inferred from the ‘new product’ and ‘new treatment’ representations that Osteo Gel was a new and different means of treating osteoarthritis, when it was neither.
22. While Osteo Gel advertising is historical (and not continuing), we consider that the representations outlined above would likely amount to a breach of the Act.

GSK NZ position

23. GSK NZ's position is that it does not agree with the Commission. It maintains that the Osteo Gel product is in fact a different product to Emulgel although it has the same active and inactive ingredients. It pointed to the difference in recommended usage periods between the two, with three weeks being medically indicated for Osteo Gel, and a maximum of two weeks for Emulgel. These usage periods were approved by Medsafe on the basis of medical trials. GSK NZ also claimed that the product size and the specially designed 'easy open' triangular cap was an important feature that distinguished it from Emulgel.
24. GSK NZ also emphasised that the customers purchasing Osteo Gel with osteoarthritis were unlikely to be the same demographic as customers using Emulgel as osteoarthritis sufferers tend to be older and under the care of a physician unlike consumers suffering from sprain and strains and other soft tissue injuries.
25. GSK NZ has, however, taken steps to address the Commission's concerns with the introduction of new product labelling for Osteo Gel that includes a statement on the front of packaging for Osteo Gel "same effective formula as Emulgel". This statement has also been added to the Osteo Gel product page on the Voltaren website.

Panadol Osteo Caplets / Panadol Back & Neck Long Lasting

26. GSK NZ has also marketed the Panadol Osteo Caplets and Panadol Back & Neck Long Lasting Caplets products for different purposes even though they have identical active ingredients. A copy of the packaging is at Attachment A.
27. We were concerned that the packaging and marketing for the products created the impression that:
 - 27.1 each product was specifically formulated or designed for the purpose of treating mild forms of osteoarthritis or back and neck pain respectively ;
 - 27.2 each product was solely effective in providing relief of persistent pain associated with osteoarthritis or back and neck pain respectively;
 - 27.3 each product was more effective for treating osteoarthritis or back and neck pain than the other product.
28. The Osteo Caplets packaging stated that the product was for "Relief of persistent pain associated with Osteoarthritis. Up to 8 hours relief 96 Bi-layer caplets". The back stated "Use Panadol Osteo for Panadol Osteo is effective for the relief of persistent pain associated with Osteoarthritis".
29. The Panadol Back & Neck Long Lasting packaging stated that it was for "Relief of back, neck & shoulder pain" and it provided "Up to 8 Hours relief". The back confirmed that the product "provides effective relief of persistent back, neck &

shoulder pain for up to 8 hours” and that it should be used for “Back Pain, Neck Pain, Shoulder Pain”.

Packaging

30. In our view, the following aspects of the packaging for the Panadol Osteo product were likely to create the impression that it was specifically formulated, designed, effective and / or solely effective in treating osteoarthritis:
- the reference to ‘Osteo’ in the product name;
 - visual representations of the bones in the knee joint with ‘cooling’ blue colour;
 - the statement “Relief from persistent pain associated with mild forms of osteoarthritis”; and
 - the statement “Panadol Osteo is effective for the relief of persistent pain associated with Osteoarthritis”.
31. The aspects of the packaging for the Panadol Back & Neck Long Lasting were also likely to have created the impression that it was specifically formulated, designed and / or solely effective in treating back and neck pain:
- The reference to the Back and Neck in the product name;
 - Visual representations showing red/orange circles depicting pain areas given relief by the product together with the statements:
 - “relief of back, neck and shoulder pain”;
 - “Panadol Back & Neck Long Lasting is a sustained release formulation that provides effective temporary relief of persistent back, neck & shoulder pain for up to 8 hours”;
 - “Use Panadol Back & Neck Long Lasting for Back Pain, Neck Pain, Shoulder Pain”.

Advertising

32. There was a range of advertising in customer newsletters and other print advertisements between 2010 and 2015 for Panadol Osteo Caplets which made various statements such as:
- “As the name Panadol Osteo suggests, it has been specifically formulated to combat the pain associated with osteoarthritis.”(2010);
 - “ Panadol Osteo has been specifically designed for people with osteoarthritis, offering sustained pain relief for up to eight hours” (2012);

- “Unique Bi-Layer Technology” (2013);
- “Panadol Osteo has been specifically designed for people with Osteoarthritis ...”(2013);
- “Only Panadol Osteo has unique paracetamol bi-layer technology” (2014);
- “Panadol Osteo brings you a unique bi-layer tablet that is gentle on the stomach...unique bi-layer technology to fight osteoarthritis pain” (2014).

33. The limited advertising for the Back & Neck Long Lasting Caplets during this period also highlighted the “unique bi-layer formulation” of the product.

Website representations

34. Osteo Caplets and Back & Neck Long Lasting Caplets had product pages on the Panadol Website. Representations on the page relating to Back & Neck Long Lasting Caplets on 24 December 2015, referred to fact that:

the unique bi-layer paracetamol formulation releases one layer quickly for rapid onset action, while the second layer is released slowly over the day or night to provide prolonged pain relief...

35. We were concerned that the product labelling and advertising for the Panadol Osteo and Back & Neck Long Lasting product may have also been misleading because although they have a “bi-layer” formulation that provides slow release of paracetamol and they have a slightly higher dose of paracetamol than standard tablets it was not specifically formulated for osteoarthritis or neck and back pain. We do not understand that Panadol Osteo or Panadol Back & Neck Long Lasting to have special efficacy for osteoarthritis or back and neck pain apart from this slow release effect.

36. Panadol Osteo or Panadol Back & Neck Long Lasting was not solely effective for providing persistent pain associated with osteoarthritis or back and neck pain. The products were equally indicated by Medsafe for muscle aches and pains and for the temporary relief of pain and discomfort associated with headache, tension headache, period pain, toothache and pain after dental procedures, cold and flu and fever.

37. The Panadol Back & Neck Long Lasting product has been discontinued since January 2016.

Panadol Rapid / Panadol Back & Neck Relief

38. Similar issues arise with the product packaging and marketing of Panadol Back & Neck Pain Relief which had the same ingredients as the general fast acting pain relief product Panadol Rapid. A copy of the packaging is at Attachment A.

39. Panadol Rapid was indicated for general pain relief which was specified on the back of the packaging to include “Headache/ Tension Headache; Migraine Headache; Cold & Flu Symptoms; Muscular Aches; Toothache; Period Pain; Helps reduce Fever”.
40. By contrast the Panadol Back & Neck Pain Relief product stated that it was for “fast effective temporary relief of Backache, Neck ache, Shoulder Pain.”
41. GSK NZ advised during the course of the Commission’s investigation that it had discontinued the Panadol Back & Neck Relief product from March 2016.

Panadol Cold & Flu Max + Decongestant / Panadol Sinus Pain & Congestion Relief

42. These products were also made from the same active ingredients. The labelling raised similar concerns for the Commission as identified with the other Panadol products.
43. We were concerned with that the labelling gave the overall impression the Panadol Sinus Pain & Congestion Relief product was a specially formulated product, was more effective and solely effective in treating sinus pain and congestion, even though the Panadol Cold & Flu Max + Decongestant product was made from exactly the same ingredients.
44. There does not appear to have been much advertising for the Sinus Pain Relief & Congestion product except on the website. We do not have concerns with the product advertising for either the Sinus Pain Relief or the Cold & Flu products.
45. When the issues discussed above were raised with GSK NZ, it responded by confirming that the Sinus Pain & Congestion Relief product was being discontinued from July 2016.

The Commission’s view

46. In the product cases identified, the Commission’s view is that GSK NZ’s conduct is likely to have breached sections 10 and/or 13(e) of the Act.
47. In our view the packaging and some marketing for the products in each case misrepresented the characteristics and / or suitability of the products. The packaging and marketing created the overall impression that the product had been specifically formulated, was more effective and / or solely effective in treating the stated indications for that product when that was not the case. In fact, the product had the same efficacy for treating either the same or broader pain indications or symptoms as represented on the originating product packaging.
48. The removal of the products Panadol Back & Neck Long Lasting, Panadol Back & Neck Relief and Panadol Sinus Pain & Congestion Relief from the market and the amendment to the Voltaren Osteo Gel packaging and website, addressed the Commission’s concerns. We have also taken into account the fact that GSK NZ sold

the products at the same price, except that Osteo Gel products were sold in larger pack sizes.

49. We recommend that you seek legal advice and encourage you to regularly review your compliance procedures and policies.
50. While we will not be taking any further action against GSK NZ at this time, we will take this warning into account if this conduct continues or if you engage in similar conduct in the future.
51. We may also draw this warning to the attention of a court in any subsequent proceedings brought by the Commission against GSK NZ.
52. This warning letter is public information. We may make public comment about our investigations and conclusions, including issuing a media release or making comment to media.

The Commission's role

53. The Commission is responsible for enforcing and promoting compliance with a number of laws that promote competition in New Zealand, including the Act. The Act prohibits false and misleading behaviour by businesses in the promotion and sale of goods and services.

Penalties for breaching the Fair Trading Act

54. Only the courts can decide if there has actually been a breach of the Act. The court can impose penalties where it finds the law has been broken. A company that breaches the Act can be fined up to \$600,000 and an individual up to \$200,000 per offence.
55. You should be aware that our decision to issue this warning letter does not prevent any other person or entity from taking private action through the courts.

Further information

56. We have published a series of fact sheets and other resources to help businesses comply with the Act and the other legislation we enforce. These are available on our website at www.comcom.govt.nz. We encourage you to visit our website to better understand your obligations and the Commission's role in enforcing the Act.
57. You can also view the Act and other legislation at www.legislation.co.nz.

58. Thank you for your assistance with this investigation. Please contact Catherine Butterworth, Chief Adviser on 09 920 3485 or by email at catherine.butterworth@comcom.govt.nz if you have any questions about this letter.

Yours sincerely



Stuart Wallace
Consumer Manager
Competition

ATTACHMENT A

Voltaren Emulgel



For temporary relief of local pain and inflammation in acute soft tissue injuries and localised soft tissue rheumatism including sprains, tendinitis, bursitis and sports injury.

DOSAGE:
Rub gently into the affected area 3 or 4 times daily. Do not use for more than 2 weeks except on medical advice. See pack leaflet for full information and warnings.

DO NOT USE IF TUBE SEAL IS BROKEN

Store below 30 °C.

Avoid contact with eyes.
For external use only.
Contains isopropyl alcohol as a preservative.

Sponsors of:
**SPORTS
MEDICINE
AUSTRALIA**

Voltaren Osteo Gel



For the temporary relief of local pain and inflammation associated with mild forms of osteoarthritis of the knees and fingers.

DOSAGE:
Rub gently into the affected area 3 or 4 times daily. Do not use for more than 3 weeks for osteoarthritis except on medical advice. See pack leaflet for full information and warnings.

DO NOT USE:

- On children under 12 years of age
- If you are pregnant or breastfeeding
- If you have an allergy to diclofenac, aspirin or any other NSAID or pain reliever

Store below 30 °C.
Avoid contact with eyes.
For external use only.
Contains isopropyl alcohol as a preservative.

Panadol Osteo Caplets

PHARMACY MEDICINE
KEEP OUT OF REACH OF CHILDREN

Panadol[®]

OSTEO

gsk

Relief of persistent pain associated with Osteoarthritis ✓
Up to 8 hours relief ✓

UP TO 8 HOURS RELIEF

96 CAPLETS

Each sustained release capsule shaped tablet (caplet) contains PARACETAMOL 665mg AUST R 116619

955P83
 PANADOL OSTEO is a bi-layer formulation that has an immediate and a sustained release layer of paracetamol, providing long-lasting pain relief for up to 8 hours.

USE PANADOL OSTEO FOR

Panadol Osteo is effective for the relief of persistent pain associated with Osteoarthritis. Suitable for:

- People with stomach ulcers
- Breastfeeding mothers

DO NOT USE PANADOL OSTEO

- If you are allergic to paracetamol
- More frequently than every 6 hours
- If using any other medicines containing paracetamol
- For children below age 12
- For more than 48 hours for children aged 12-17 except on medical advice
- For more than a few days at a time in adults except on medical advice
- If any of the seals on this packaging are broken
- If the packaging use-by date has expired

CHECK WITH YOUR DOCTOR BEFORE USING IF YOU

- Have liver or kidney problems
- Are taking warfarin (a medicine used to thin the blood)

HOW TO USE PANADOL OSTEO

Age	Caplets	How often
12- Adult	2	Swallowed whole with water three times a day every 6 - 8 hrs (maximum 6 caplets in 24 hrs)

- Doses should be equally spaced throughout the day
- Can be taken with or without food
- The caplets must not be crushed

Store below 30°C.

(B) 135518 EXP JAN 19

STOP USE AND TELL YOUR DOCTOR IF YOU

Have an allergic reaction, shortness of breath or wheezing after taking Panadol.

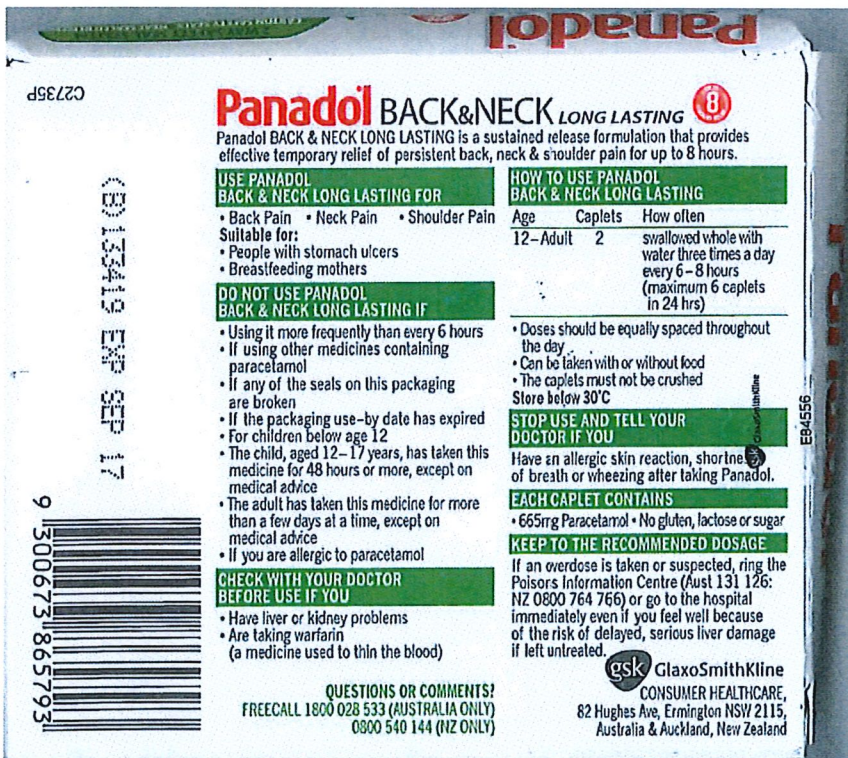
EACH CAPLET CONTAINS

- 665mg Paracetamol • No gluten, lactose or sugar

KEEP TO THE RECOMMENDED DOSAGE

If an overdose is taken or suspected, ring the Poisons Information Centre (Australia 131 126; NZ 0800 764 766) or go to the hospital immediately even if you feel well because of the risk of delayed, serious liver damage if left untreated.

Panadol Back & Neck Long Lasting



Panadol Rapid



C2732P

C015924 EXP MAY 18

9 300673 814968

Panadol Rapid

Absorbed twice as fast as regular Panadol tablets

USE PANADOL RAPID FOR

Fast, effective temporary relief of pain and discomfort associated with:

- Headache/Tension Headache • Toothache
- Migraine Headache • Period Pain
- Cold & Flu Symptoms
- Muscular Aches

Helps reduce fever

Suitable for:

- People with stomach ulcers
- Breastfeeding mothers

DO NOT USE PANADOL RAPID

- If you are allergic to paracetamol
- If using other medicines containing paracetamol
- For children below age 12
- For more than 48 hours for children aged 12–17 except on medical advice
- For more than a few days at a time in adults except on medical advice
- If any of the seals on this packaging are broken
- If the packaging use-by date has expired

CHECK WITH YOUR DOCTOR BEFORE USE IF YOU

- Have liver or kidney problems
- Are taking warfarin (a medicine used to thin the blood)

QUESTIONS OR COMMENTS?
 FREECALL 1800 028 533 (AUSTRALIA ONLY)
 0800 540 144 (NZ ONLY)

HOW TO USE PANADOL

Age	Caplets	How often
12–Adult	2	every 4–6 hrs with water as required (maximum 8 caplets in 24 hrs)

Store below 30°C.

STOP USE AND TELL YOUR DOCTOR IF YOU

Have an allergic skin reaction, shortness of breath or wheezing after taking Panadol.

EACH CAPLET CONTAINS

- 500mg Paracetamol
- No gluten, lactose or sugar
- Potassium sorbate as preservative
- Sodium – two caplets contain 344mg (15mmol) – this should be taken into account by those on a low sodium diet

KEEP TO THE RECOMMENDED DOSAGE

If an overdose is taken or suspected, ring the Poisons Information Centre (Aust 131 126; NZ 0800 764 766) or go to the hospital immediately even if you feel well because of the risk of delayed, serious liver damage if left untreated.

gsk GlaxoSmithKline
 CONSUMER HEALTHCARE,
 82 Hughes Ave, Errington NSW 2115,
 Australia & Auckland, New Zealand

Panadol Back & Neck

Panadol

BACK&NECK
PAIN RELIEF

Effective relief of back, neck and shoulder pain ✓
Absorbed twice as fast as regular Panadol tablets ✓

20 CAPLETS

Each capsule shaped tablet (caplet) contains PARACETAMOL 500mg AUST R 141412

C2737P

Panadol BACK&NECK
PAIN RELIEF

USE PANADOL BACK & NECK PAIN RELIEF FOR

Fast, effective temporary relief of:

- Backache • Neckache • Shoulder Pain

Suitable for:

- People with stomach ulcers
- Breastfeeding mothers

DO NOT USE PANADOL BACK & NECK PAIN RELIEF

- If you are allergic to paracetamol
- If using other medicines containing paracetamol
- For children below age 12
- For more than 48 hours for children aged 12–17 except on medical advice
- For more than a few days at a time in adults except on medical advice
- If any of the seals on this packaging are broken
- If the packaging use-by date has expired

CHECK WITH YOUR DOCTOR BEFORE USE IF YOU

- Have liver or kidney problems
- Are taking warfarin (a medicine used to thin the blood)

HOW TO USE PANADOL

Age	Caplets	How often
12-Adult	2	every 4–6 hrs with water as required (maximum 8 caplets in 24 hrs)

Store below 30°C.

STOP USE AND TELL YOUR DOCTOR IF YOU

Have an allergic skin reaction, shortness of breath or wheezing after taking Panadol.

EACH CAPLET CONTAINS

- 500mg Paracetamol
- No gluten, lactose or sugar
- Potassium sorbate as preservative
- Sodium – 8 caplets contain 1.4g sodium which should be taken into account by those on a low sodium diet

KEEP TO THE RECOMMENDED DOSAGE

If an overdose is taken or suspected, ring the Poisons Information Centre (Aust 131 126; NZ 0800 764 766) or go to the hospital immediately even if you feel well because of the risk of delayed, serious liver damage if left untreated.

QUESTIONS OR COMMENTS?
FREECALL 1800 028 533 (AUSTRALIA ONLY)
0800 540 144 (NZ ONLY)

gsk GlaxoSmithKline
CONSUMER HEALTHCARE,
82 Hughes Ave, Ermington NSW 2115,
Australia & Auckland, New Zealand

9 300673 866134

Panadol Cold & Flu Max + Decongestant



d182c

Panadol COLD & FLU MAX + DECONGESTANT

HOW TO USE PANADOL® COLD & FLU MAX + DECONGESTANT

Age	Caplets	How often
12-Adult	2	Every 4-6 hrs as necessary, taken with water (maximum 8 caplets in 24 hrs)

• Do not give to children under 12 years of age
 • This product may cause dizziness. If affected, do not drive or operate machinery
 • If symptoms persist see your doctor
 Store below 30°C

DO NOT USE PANADOL® COLD & FLU MAX + DECONGESTANT

- If you are allergic to paracetamol, phenylephrine or any ingredient in product
- If using other medicines containing paracetamol, phenylephrine or other medicines for the relief of cough & colds, congestion or blocked nose
- In children under 12 years of age
- For more than 48 hours (for children 12-17 years) or more than a few days (adults), except on medical advice
- If you are taking or have taken in the past 2 weeks, medicines called monoamine oxidase inhibitors (MAOI's) usually used to treat depression
- Within several hours of going to bed as it may cause sleeplessness
- If any of the seals on this package are broken
- If the use-by date has expired

QUESTIONS, COMMENTS OR MORE INFORMATION?
 FREECALL 0800 540 144
 Visit www.panadol.co.nz

CHECK WITH YOUR DOCTOR BEFORE USING IF YOU

- Have any medical conditions
- Are taking any regular medication
- Are pregnant, trying to become pregnant or breastfeeding

STOP USE AND TELL YOUR DOCTOR IF YOU

- Have an allergic skin reaction, shortness of breath or wheezing after taking this medicine
- Have any unexplained bruising or bleeding
- Have unusually fast pulse or irregular heartbeat

USE PANADOL® COLD & FLU MAX + DECONGESTANT FOR

Fast, effective, temporary relief of cold and flu symptoms including:

- Headache
- Body Aches & Pain
- Blocked or Runny Nose
- Sore Throat
- Reduces Fever

EACH CAPLET CONTAINS

Paracetamol 500mg, Phenylephrine Hydrochloride 5mg. Also contains Potassium Sorbate as preservative.

KEEP TO THE RECOMMENDED DOSAGE

If an overdose is taken or suspected, ring the Poisons Information Centre (0800 764 766) or go to the hospital immediately even if you feel well because of the risk of delayed, serious liver damage if left untreated.

gsk GlaxoSmithKline
 CONSUMER HEALTHCARE
 Auckland, New Zealand

BATCH CODE AND EXPIRY TO GO HERE:
13 DIGIT APN
80 Macquarie Street
10th Floor
PO Box 2999
Wellington 3142
9 000000 000000

Panadol COLD & FLU MAX + DECONGESTANT
POSITIONAL ONLY
PRINTER TO STRIP IN PHARMACODE

Panadol Sinus Pain & Congestion Relief

2 WAY SAFETY SEAL SYSTEM
 * 2 SEALS, 2 POINTS OF CONTACT *
 * 2 POINTS OF CONTACT *
 * 2 SEALS, 2 POINTS OF CONTACT *

Panadol
 SINUS PAIN & CONGESTION RELIEF

Panadol
 SINUS PAIN & CONGESTION RELIEF

NON DROWSY
 NOT DROWSY

Sinus Headache ✓
 Sinus Pain ✓
 Nasal Congestion ✓

Each capsule-shaped tablet (CAPLET) contains PARACETAMOL 500mg, PHENYLEPHRINE HYDROCHLORIDE 5mg
 AUST.R.147590

SINUS

Panadol
 SINUS PAIN & CONGESTION RELIEF

20 CAPLETS

Panadol
 SINUS PAIN & CONGESTION RELIEF **20 CAPLETS**

Recycle

Panadol® is a registered trade mark of the GlaxoSmithKline group of companies.

POSITIONAL ONLY
PRINTER TO STRIP IN PHARMACODE

Panadol
 SINUS PAIN & CONGESTION RELIEF



Panadol
SINUS PAIN & CONGESTION RELIEF

d81823

BATCH CODE AND EXPIRY TO GO HERE

13 DIGIT APN
.80 MAGNIFICATION
PRINTS PMS 7272
BACKGROUND PMS 7777
9 300673 876331

Panadol

SINUS PAIN & CONGESTION RELIEF

HOW TO USE PANADOL® SINUS PAIN & CONGESTION RELIEF

Age	Caplets	How often
12- Adult	2	Every 4-6 hrs as necessary, taken with water (maximum 8 caplets in 24 hrs)

- Do not give to children under 12 years of age
- This product may cause dizziness. If affected, do not drive or operate machinery
- If symptoms persist see your doctor

Store below 30°C

DO NOT USE PANADOL® SINUS PAIN & CONGESTION RELIEF

- If you are allergic to paracetamol, phenylephrine or any ingredient in product
- If using other medicines containing paracetamol, phenylephrine or other medicines for relief of cough, colds, congestion or blocked nose
- In children under 12 years of age
- For more than 48 hours (for children 12-17 years) or more than a few days (adults), except on medical advice
- If you are taking or have taken in the past 2 weeks, medicines called monoamine oxidase inhibitors (MAOI's) usually used to treat depression
- Within several hours of going to bed as it may cause sleeplessness
- If any of the seals on this package are broken
- If the use by date has expired

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 0800 540 144 (NZ ONLY)
 Visit www.panadol.com.au or www.panadol.co.nz

CHECK WITH YOUR DOCTOR BEFORE USING IF YOU

- Have any medical conditions
- Are taking any regular medication
- Are pregnant, trying to become pregnant or breastfeeding

STOP USE AND TELL YOUR DOCTOR IF YOU

- Have an allergic skin reaction, shortness of breath or wheezing after taking this medicine
- Have any unexplained bruising or bleeding
- Have unusually fast pulse or irregular heartbeat

USE PANADOL® SINUS PAIN & CONGESTION RELIEF FOR

Fast, effective, temporary relief of sinusitis symptoms including:

- Sinus Headache
- Sinus Pain
- Nasal Congestion

EACH CAPLET CONTAINS

Paracetamol 500mg
 Phenylephrine Hydrochloride 5mg
 Also contains Potassium Sorbate as preservative.

KEEP TO THE RECOMMENDED DOSAGE

If an overdose is taken or suspected, ring the Poisons Information Centre (Aust 131 126; NZ 0800 764 766) or go to the hospital immediately even if you feel well because of the risk of delayed, serious liver damage if left untreated.

GlaxoSmithKline
 CONSUMER HEALTHCARE
 82 Hughes Ave, Ermerington NSW 2115,
 Australia & Auckland, New Zealand

Attachment B

Website pages



Voltaren® Osteo Gel

Targeted relief for mild forms of osteoarthritis

FAST ACTING

Voltaren® Rapid 12.5 liquid capsules (/brands/fast-acting/voltaren-rapid-125-liquid-capsules)

Voltaren® Rapid 25 tablets (/brands/fast-acting/voltaren-rapid-25-tablets)

LONG-LASTING FOR STRONGER PAIN

Voltaren® Rapid 25 tablets (/brands/long-lasting-for-stronger-pain/voltaren-rapid-25-tablets)

OSTEOARTHRITIS PAIN RELIEF

Voltaren® Osteo Gel (/brands/osteoarthritis-pain-relief/voltaren-osteo-gel)

TREAT THE SOURCE

Voltaren® Emulgel® (/brands/treat-the-source/voltaren-emulgel)

Voltaren® Rapid 12.5 tablets (/brands/treat-the-source/voltaren-rapid-125-tablets)

Voltaren® Rapid 25 tablets (/brands/treat-the-source/voltaren-rapid-25-tablets)

PRODUCT COMPARISON (BRANDS/PRODUCT-COMPARISON)

Usage:

Voltaren Osteo Gel is clinically proven for temporary relief of local pain and inflammation in mild forms of osteoarthritis of the knees and fingers.

Effect:

Voltaren Osteo Gel contains the non-steroidal anti-inflammatory drug (NSAID), diclofenac. Diclofenac works to relieve pain and reduce inflammation (swelling). The patented technology in Voltaren Osteo Gel helps the gel to penetrate deeply into the skin to enhance delivery of diclofenac to the site of pain. Voltaren Osteo Gel has a cooling, moisturising effect with no strong odours.

Application:

Adults and children over 12 years: rub the gel gently into the affected area. Apply three or four times each day. The amount you will need will depend on the size of the affected area. Usually an amount ranging in size from a cherry to a walnut will be enough. Use for up to three weeks, if needed.

Pack size:

Voltaren Osteo Gel is available in 75 g and 150 g tubes.

You may also be interested in:

Joint pain/osteoarthritis (/pain/joint-pain)

PRODUCTS (/PRODUCTS)

FAST ACTING (/PRODUCTS/FAST-ACTING)
 LONG LASTING FOR STRONGER PAIN (/PRODUCTS/LONG-LASTING-FOR-STRONGER-PAIN)
 OSTEOARTHRITIS PAIN RELIEF (/PRODUCTS/OSTEOARTHRITIS-PAIN-RELIEF)
 TREAT THE SOURCE (/PRODUCTS/TREAT-THE-SOURCE)
 PRODUCT COMPARISON (/PRODUCTS/PRODUCT-COMPARISON)

PAIN (/PAIN)






WHAT IS PAIN? (/PAIN/WHAT-IS-PAIN)
 WHAT CAUSES PAIN (/PAIN/WHAT-CAUSES-PAIN)
 IDENTIFY YOUR PAIN (/PAIN/IDENTIFY-YOUR-PAIN)
 ABOUT VOLTAREN® (/PAIN/ABOUT-VOLTAREN)

KEEP MOVING (/KEEP-MOVING)

EXERCISE PROGRAMS (/KEEP-MOVING/EXERCISE-PROGRAMS)
 EVERYDAY HEALTHY MOVEMENTS (/KEEP-MOVING/HEALTHY-EVERYDAY-MOVEMENTS)

NEWS & UPDATES (/NEWS-AND-ARCHIVES)
 FAQs (/PAGES/FAQ)
 CONTACT (/PAGES/CONTACT-US)
 SITE MAP (/SITEMAP)

Product Comparison

	Your situation	Use for	Format	Benefits	Dosage	Duration of use	Package size
 Voltaren® Emulgel (product/treat-the-source/voltaren-emulgel)	You want targeted relief right where you need it	Inflammation of muscles, joints, tendons and ligaments due to injury, as well as back, neck and shoulder pain	Gel	Soothing, cooling, low odour	Adults and children over 12 years: apply 3-4 times a day. Follow full directions in pack leaflet.	2 weeks, if needed	20 g, 50 g, 100 g, 120 g tube
 Voltaren® Osteo-Gel (product/osteoarthritis-pain-relief/voltaren-osteo-gel)	You want targeted relief for mild forms of osteoarthritis	Occasional pain and inflammation in mild forms of osteoarthritis of the knees and fingers	Gel	Soothing, cooling, low odour	Adults and children over 12 years: apply 3-4 times a day. Follow full directions in pack leaflet.	3 weeks, if needed	75 g, 150 g tube
 Voltaren® Rapid 12.5 tablets (product/treat-the-source/voltaren-rapid-125-tablets)	You want a treatment that's quickly proven to restore your movement sooner	Mild to moderate muscle, back, and distally proven rheumatic pain	Tablets	Small and easy to swallow	Adults and children over 14 years: 1 or 2 tablets every 4-6 hours as required. Follow full directions in pack leaflet.	A few days, if needed	10, 20 or 30 tablet pack
 Voltaren® Rapid 12.5 liquid capsules (product/fast-acting/voltaren-rapid-125-liquid-capsules)	You want fast-absorbing relief for muscle, back, and rheumatic pain	Mild to moderate muscle, back, and rheumatic pain	Liquid Capsules	Small, easy to swallow, with liquid capsule technology for fast absorption	Adults and children over 14 years: 1 or 2 capsules every 4-6 hours as required. Follow full directions in pack leaflet.	A few days, if needed	20 liquid capsule pack
 Voltaren® Rapid 25 tablets (product/long-lasting-for-stronger-pain/voltaren-rapid-25-tablets)	You want long-lasting relief for tough pain	Painful conditions where swelling is a problem, such as back or joint pain, muscle strain, sprains or tendonitis	Tablets	Fantacting and long-lasting for tough pain	Adults and children over 14 years: 1 or 2 tablets every 8 hours as required. Follow full directions in pack leaflet.	A few days, if needed	20 or 30 tablet pack

PRODUCTS (PRODUCTS)

FAST ACTING (PRODUCTS/FAST-ACTING)
LONG LASTING FOR STRONGER PAIN (PRODUCTS/LONG-LASTING-FOR-STRONGER-PAIN)
OSTEOARTHRITIS PAIN RELIEF (PRODUCTS/OSTEOARTHRITIS-PAIN-RELIEF)
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EXERCISE PROGRAMS (KEEP-MOVING/EXERCISE-PROGRAMS)
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NEWS & UPDATES (NEWS-AND-UPDATES)

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