

## Consultation

### 1 Should a warning statement about a fire hazard be included on the package labels of paraffin-based skin products

Yes

#### Please add your comments:

The Guild supports additional labelling in the interest of public safety as these types of products are often sold over-the-counter through pharmacy without additional counselling or supervision by a pharmacist. Paraffin-based products are commonly prescribed in large quantities, particularly for children. Products such as emulsifying ointment are prescribed to be used generously as a moisturiser or a soap substitute to minimise the use of steroid creams in conditions such as eczema. It makes sense that the warning that is already contained in the New Zealand Formulary and available to health professionals is made more publicly known. The risk associated with these products has been known since 2006 when the initial death of a patient in the United Kingdom (UK) highlighted the fire hazard. A study has shown that paraffin has a similar burning rate to petrol and diesel(1). A BBC 5 Radio Live article(2) reported that since 2010 there have been 37 fire deaths in the UK linked to paraffin-based products. They also reported that the Medicines & Healthcare Regulatory Agency (MHRA) was urging manufacturers to add a fire hazard warning to packaging of skin products containing any paraffin. It was revealed that Fire Services in the UK were warning that these products may have played a role in many other deaths, potentially hundreds. While the warning from the UK Fire Services has not been proven, there is no doubt that paraffin-based skin products have an associated fire risk and consumers need to be made aware of this.

1) National Patient Safety Authority, Health & Safety Laboratory, UK. "Fire hazards of fire-impregnated dressings". Dec 2006, UK.

2) BBC Radio 5 Live, "Skin creams containing paraffin linked to fire deaths". 19 Mar 2017.

### 2 Would you prefer Option 1 or Option 2 as a warning statement?

Option 1

#### Please add your comments:

We believe Option 1 is preferable as it contains more information for the consumer and in this instance, we feel the more information, the better. The health literacy level of average New Zealanders is surprisingly low. "Over 50% of the adult New Zealand population are likely to have some difficulty with health literacy"(1). We believe that health information messaging to consumers is best delivered in plain English, with specific directions. The extra information offered by the phrase "You should keep away from fire when using this product" is important information. Although it means that the package contains a bigger label, it clearly explains to consumers what is expected of them in order to minimise their risk.

1) Retrieved 6 Nov 2018, [www.healthnavigator.org.nz](http://www.healthnavigator.org.nz). Health Navigator NZ, "Health Literacy".

### 3 Does Option 1 adequately address the fire hazard risk (ie, Caution: If this product comes into contact with dressings and clothing the fabric can be more easily ignited with a naked flame. You should keep away from fire when using this product)?

Yes

#### Please add your comments:

We believe that Option 1 is adequate but could be improved further. The labelling could be even more explicit, stating "Do not smoke", "Stay away from smokers" and/or "Beware of open flame ignition sources such as lighters, cigarettes and matches" or other such wording. Another option would be to use pictures of commonly known safety symbols, such as "flammable" and "no smoking", particularly if space on packaging was an issue.

### 4 Does Option 2 adequately address the fire hazard risk (ie, Caution: This product may make dressings and clothing more easily ignited with a naked flame)?

No

#### Please provide your comments:

Option 2 doesn't tell people what they should or shouldn't do to minimise their risk, ie don't smoke or be near smokers, don't use cigarettes, lighters or matches or be near any other source of fire or open flame. While both options do appear obvious, we believe that in this instance more information is better.

### 5 Should the warning statement only apply to products containing 50% or more of paraffin

Yes

#### Please provide your comments:

Products containing 50% or more appear to be those associated with the greatest risk. We believe that it makes sense to be consistent with the warnings that overseas countries such as the United Kingdom (UK) provide. We do think however that there is still considerable risk to consumers using products containing a lesser percentage of paraffin (e.g. a 40% paraffin product used in large quantities and/or on a large area of a person's body). We would like to suggest that resources are made available such as those provided in the UK by the NHS. Such resources would enable pharmacy staff to give the fire hazard message to patients buying any paraffin-based emollient. These could be provided to consumers as a leaflet when purchasing any non-cosmetic paraffin-based product, or poster information displayed in an area where paraffin-based emollients are stored and sold.

**6 Should the warning statement only apply to packs intended for use in large quantities (eg. pack size of 50g or more)?**

No

**Please add your comments:**

Even small amounts of paraffin-based emollients can have a cumulative effect in clothes and bedding. It can be hard to remove residue unless these items are washed in a hot wash cycle each wash. The Guild believes the warning statement needs to be on any product with more than 50% paraffin. Even a smaller sized pack used in its entirety over a large area has a potential risk. There is always potential for people to purchase several smaller packs to be used at the same time. We feel that consistency of messaging is important, as any variation leads to confusion.

**7 Do you have any other comments about a proposed warning statement regarding a fire hazard on the labels of paraffin-based skin products?**

**Please add your comments:**

- We believe that the posters and pamphlets produced by the NHS in the United Kingdom explaining the fire hazards associated with paraffin-based skin products are an excellent resource. Consumer information presented in a similar way for the New Zealand public could be made available in pharmacies and GP surgeries. We suggest that information on how to remove paraffin from clothing and bedding would be useful for patients and caregivers. Written information is especially important in the early stages of the relabeling process as it is likely there will be a time lag before all manufacturers update their packaging. These resources could be handed out by pharmacy staff to ensure consumers are informed of the updated messaging, in advance of any labelling changes. We would encourage Medsafe to develop such resources.
- For consistency the fire hazard risk should also be made clear to every patient that receives a prescription for a paraffin-based skin product. It is a timely reminder to doctors and pharmacists to educate their patients of the risk of paraffin-based skin products if they have not already been doing so.
- Through our subsidiary, Pharmaceutical Services Limited (PSL) we have the ability to create Cautionary and Advisory Labels (CALs) for pharmacies to stick appropriate physical warning messages on all dispensed prescription items. We have been in discussions with the Pharmaceutical Society of New Zealand (PSNZ) and dependent on the outcome of this consultation we will work together to create an appropriate CAL highlighting the fire hazard risk with regards to paraffin-based skin products. These CALs are also embedded into the pharmacy dispensing software to prompt pharmacy staff to either incorporate the CAL into the dispensing label or to otherwise stick the physical CAL onto the completed prescription item.

**Your details**

**8 Your details**

**Name and designation:**

[REDACTED]

**Company/organisation name (if applicable):**

Pharmacy Guild

**Address:**

[REDACTED]  
[REDACTED]

**Phone number:**

[REDACTED]

**Email address:**

[REDACTED]

**9 This submission is:**

made on behalf of a group or organisation(s)

**10 I am, or I represent an organisation, based in:**

New Zealand

**If you selected other, please specify:**

**11 I am, or I represent, a:**

Industry organisation

**If you selected health professional, please indicate your type of practice:**

**If you selected other, please specify:**

**Publishing submissions and privacy**

## **12 Publishing submissions**

You may publish this submission

## **13 Official Information Act responses**

Include my personal details in responses to Official Information Act requests

## **14 Commercially sensitive information**

This submission does not contain commercially sensitive information

**If your submission contains commercially sensitive information, please let us know where.:**