

Complaint to TGA: Non-compliance with regulatory obligation letter - Pain Erazor

Acknowledgment

These complaints were worked up by a Monash staff member because of non-compliance by the advertisers to a TGA regulatory obligation letter. They were checked and submitted by Assoc Prof Ken Harvey.

Summary

“Pain Erazor” (ARTG no: 276939) won a [2017 Choice “Shonky” award](#), was the subject of a [N.Z. Consumer review](#), and also a TGACRP complaint ([26/03/2018](#)) sent to the CRP. The CRP felt this complaint was better dealt with by another authority and referred it to the TGA. There is no record of any action by the TGA about this referral.

Because of this, another [complaint about this product](#) was sent to the TGA on 03 August 2018 (AC-E7JS15BB/2018). Despite the documented past history, this complaint was categorised as low risk by the TGA and closed on 24-Sep-2018 with a Regulatory Obligations letter sent to the advertisers.

This is unacceptable; a new complaint about a product that has had previous upheld complaints should have been accorded a higher priority according to the TGA’s risk-based activity model.¹

Regardless, this product is still being advertised online. Given non-compliance by the advertisers to their TGA regulatory obligation letter, I ask that this latest complaint be dealt with more effectively.

The complaint

Pain Erazor (AC-E7JS15BB/2018)

The domain: painerazor.com.au now automatically redirects to <https://tvshop.com.au/products/pain-erazor>.

Domain Name: PAINERAZOR.COM.AU Registrant: Brand Developers Aust Pty Ltd Registrant ID: ACN 115139565 Registrant Contact Email: itsupport@branddevelopers.co.nz	Domain Name: TVSHOP.COM.AU Registrant: TVSHOP PTY LIMITED Registrant ID: ACN 624627194 Registrant Contact Email: itsupport@branddevelopers.co.nz
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Australian Company
TVSHOP PTY LIMITED
ACN 624 627 194

Extracted from ASIC's database at AEST 17:29:18 on 05/12/2019

Company Summary	
Name:	TVSHOP PTY LIMITED
ACN:	624 627 194
Registration Date:	03/04/2018
Next Review Date:	03/04/2020
Status:	Registered
Type:	Australian Proprietary Company, Limited By Shares
Locality of Registered Office:	SOUTHBANK VIC 3006
Regulator:	Australian Securities & Investments Commission

Pain Erazor (ARTG 276939) is included in the ARTG as a Medical Device Class IIa (GMBN 61169 - Transcutaneous electrical stimulation probe). Intended purpose: A device to provide electrical stimuli through the body surface to stimulate nerves and muscles, and stimulate the production of endorphins, in order to provide relief of chronic and acute pain.

¹ <https://www.tga.gov.au/publication/complaints-handling-advertising-therapeutic-goods-australian-public>

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The earlier complaints reviewed the literature and disputed the claim that this device stimulated the production of endorphins and provide relief of chronic and acute pain over and above that caused by a placebo.

Similar claims continue to be made at <https://painerazor.com.au/>, "***Drug free pain relief, anytime, anywhere***", "***stimulates your body's endorphin's, nature's own pain relief, to send real pain relief - right where you need it***", "***Fast and effective***" (screen shots shown in Appendix I).

It is alleged the above claims breach the Therapeutic Goods Advertising Code (No.2) 2018, s.9(a), 9(b), 10(a)(ii), 10(c), 15(2)(b) and the testimonials (which need statutory declarations) may also breach s.17(2).

Given the failure of the sponsor to respond to the TGA's Regulatory Obligations letter (and previous upheld complaints), significant financial sanctions and a retraction order should be applied, and this product should be removed from the ARTG.

Dr Ken Harvey MB BS, FRCPA, AM
Associate Professor
Public Health and Preventive Medicine
Monash University
6 January 2020

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Appendix I

MENU

 Pain Erazor
Pain relief pen

FREE BOOK WORTH \$49.95

Discover the Power of Drug Free Pain Relief

72 Of The Latest Life Developments

30 DAY RISK FREE TRIAL*

DRUG FREE PAIN RELIEF ANYTIME, ANYWHERE

Fast, affordable, convenient & extraordinarily effective!

30 Days Risk Free Trail*

CALL NOW

<https://tvshop.com.au/products/pain-erazor>

PAIN RELIEF PEN

Say goodbye to the suffering you experience when pain or discomfort strikes.

Introducing the **Pain Erazor Pen** - the incredible innovation in drug free pain relief. With just a press of a button, you can get the relief you've been looking for.

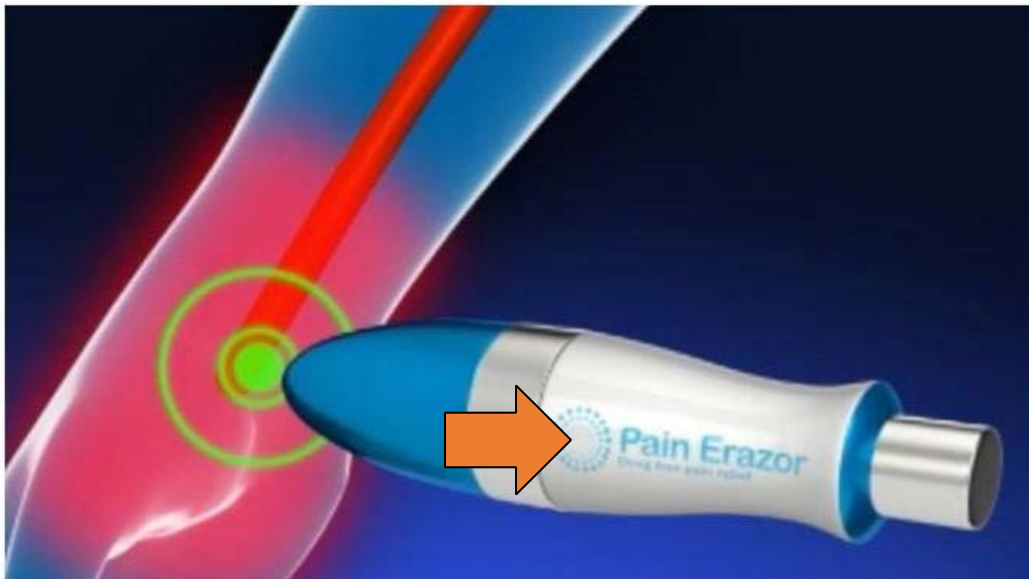
An effective way to soothe and relieve pain without using medication.

CALL NOW

<https://tvshop.com.au/products/pain-erazor>

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How It Works



THE SCIENCE OF ELECTRO-ANALGESIA

The secret to the Pain Erazor is the science of Electro-Analgesia which utilises your body's own natural pain response system to relieve the effects of all types of pain.

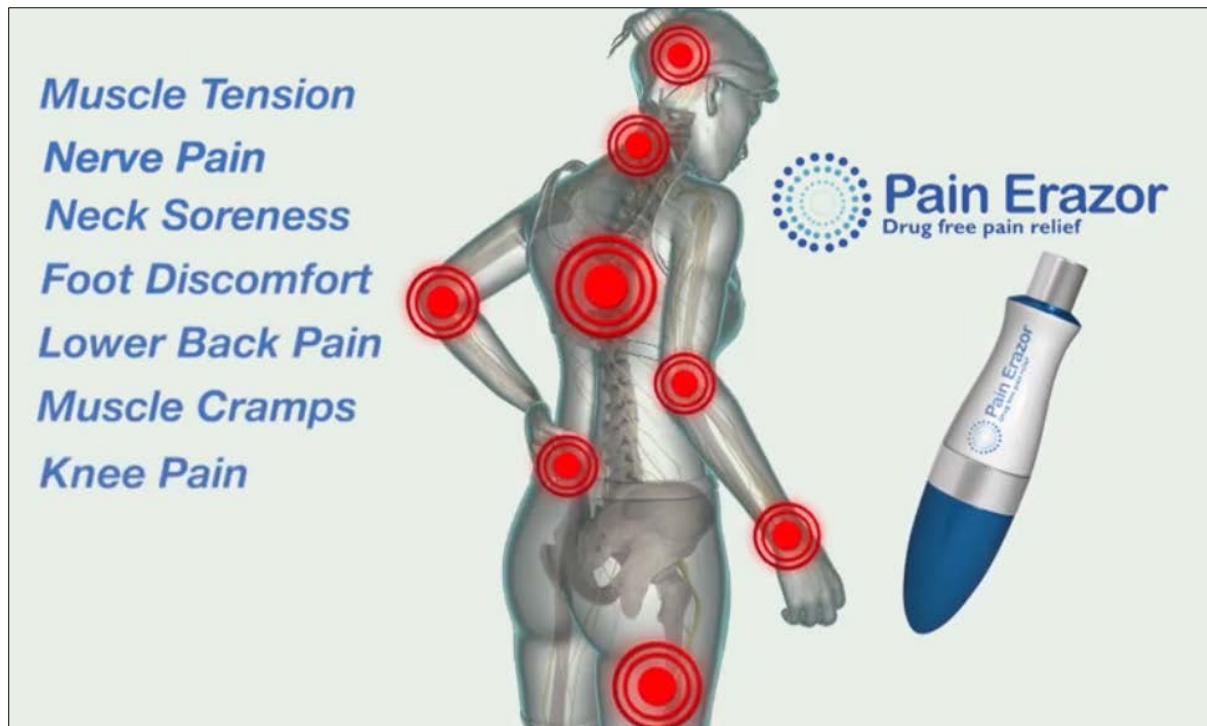
It works by means of pressure exerted on a quartz crystal, which results in a tiny electric charge. The Pain Erazor naturally stimulates your body's endorphin's, nature's own painkillers, to send real pain relief - right where you need it.

<https://tvshop.com.au/products/pain-erazor>

- Natural pain relief - with none of the undesired side-effects of drugs
- Compact & light
- Easy to use
- Fast & effective
- Convenient
- Works without batteries, electrodes or wires
- Pain relief right where you need it - no drugs, messy creams or expensive treatments.

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<https://tvshop.com.au/products/pain-erazor>



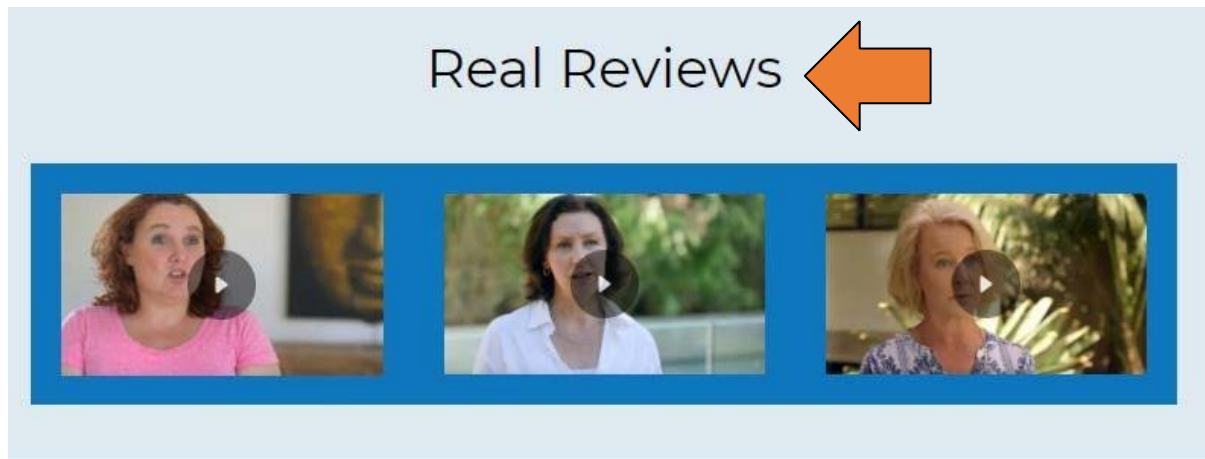
Muscle Tension
Nerve Pain
Neck Soreness
Foot Discomfort
Lower Back Pain
Muscle Cramps
Knee Pain

Pain Erazor
Drug free pain relief

The advertisement features a central illustration of a human figure from the back, with several red circular markers indicating areas of pain or discomfort: the neck, upper back, lower back, right shoulder, right elbow, right wrist, and right knee. To the right of the figure is the 'Pain Erazor' product, a blue and silver handheld device. The product name and 'Drug free pain relief' are written next to a circular logo consisting of small blue dots.

<https://tvshop.com.au/products/pain-erazor> (<https://youtu.be/9pm0sx5lkwY>)

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By Robyn from Muswellbrook (0 of 1 customers found this review helpful) 29/7/2018

5.0

I would recommend this product to everyone.

I tried this product as soon as I received it. I couldn't use it properly because I needed someone else to do it for me. I couldn't reach the area that needed this pain gone. I have a frozen shoulder & require a full shoulder replacement. All I could reach was the front of my shoulder & the pain eraser appeared to work quite well, but now that area is too tender & I can no longer use it.

Bottom Line Yes, I would recommend this to a friend

Was this review helpful? Yes / No
You may also flag this review

By Misfit6 from Brisbane (0 of 3 customers found this review helpful) 21/7/2018

4.0

Pain Eraser

I tore most of the ligaments in my wrist the pain eraser has been helping to ease the pain in my wrist definitely worth a try

Bottom Line Yes, I would recommend this to a friend

Was this review helpful? Yes / No
You may also flag this review

By Robyn from Victoria (1 of 4 customers found this review helpful) 15/7/2018

5.0

Excellent product

I was unsure whether this item would be worth the purchase price, but it has proven to be effective.

Bottom Line Yes, I would recommend this to a friend

Was this review helpful? Yes / No
You may also flag this review

By Andrew from Melbourne (2 of 5 customers found this review helpful) 12/7/2018

3.0

not for me

a bit scary, it does not work for me, but my girlfriend uses it and she says its works for her joint pains.

Bottom Line Yes, I would recommend this to a friend


Was this review helpful? Yes / No
You may also flag this review

<https://tvshop.com.au/products/pain-erazor>

Are statutory declarations available?

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[Home](#) > [Products](#) > [Health Products](#) > [Medicines](#) > [Muscle & Pain Relief Products](#) > Pain Erazor



Pain Erazor

★ ★ ★ ☆ ☆ 2.4 from 46 reviews [Stats](#)

[Write a review](#) [Ask a question](#)

1 photo

[Reviews](#) (46) [Q&A](#) (29) [Details](#) [Compare](#)

<https://www.productreview.com.au/listings/pain-erazor>

[David Marshall](#)

Don't be fooled

published 11 months ago

Here are the facts according to my experience don't waste your money as it truly does not work. I followed the instructions to the letter and nothing happens when your in pain you will try anything what a waste.

In fairness to them they gave me my money back. Thank you.

Read the reviews and see your Dr first

Purchased in September 2017 at [Show TV Shop](#).

[George](#)

Total nonsense

published 11 months ago

Do not buy this product as it does not work, waste of money and a big scam. These people shouldn't be allowed to sell these kind of products.

[Tartisdriver](#)

You can buy this item on ebay for about \$A15, with free postage. But save your money, doesnt work anyway

[Pauline](#)

Load of rubbish

published 11 months ago

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I have tried pain erazor and does nothing. I'm sick and tired off these companie giving false hope.
Don't buy.

[Gonz](#)

Waste of money and time

published 11 months ago

This does not work, has no clinical evidence to back up its claims, is ridiculously overpriced and not to mention last year received a "shonky" award from consumer group.