

# Complaint to TGA: Brand Developers Australia Pty Ltd, Pain Erazor

## Acknowledgment

This complaint was stimulated by Paulina Stehlik [pstehlik@bond.edu.au](mailto:pstehlik@bond.edu.au) who saw the appended advertisement on TV and asked, "Pain Erazor: didn't the TGA get rid of this one?"

## Background

"Pain Erazor" (ATG 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 TGA, for which I can find no outcome.

See also the references in a complaint sent on 15 July 2018, [Au Remedial, Pain®Gone and Pain®Gone Plus](#), AC-KD45638R/2018.

## This complaint

Regardless, Pain Erazor is [still being promoted](#) for "relief from all types of pain including back & neck pain, arthritis, skeletal pain & aching muscles" and for "acute or chronic pain including muscle tension, nerve pain, neck soreness, foot discomfort, lower back pain, muscle cramps, knee pain and shoulder tension". The web sites involved also have [numerous dubious testimonials](#) which require validation by statutory declarations.

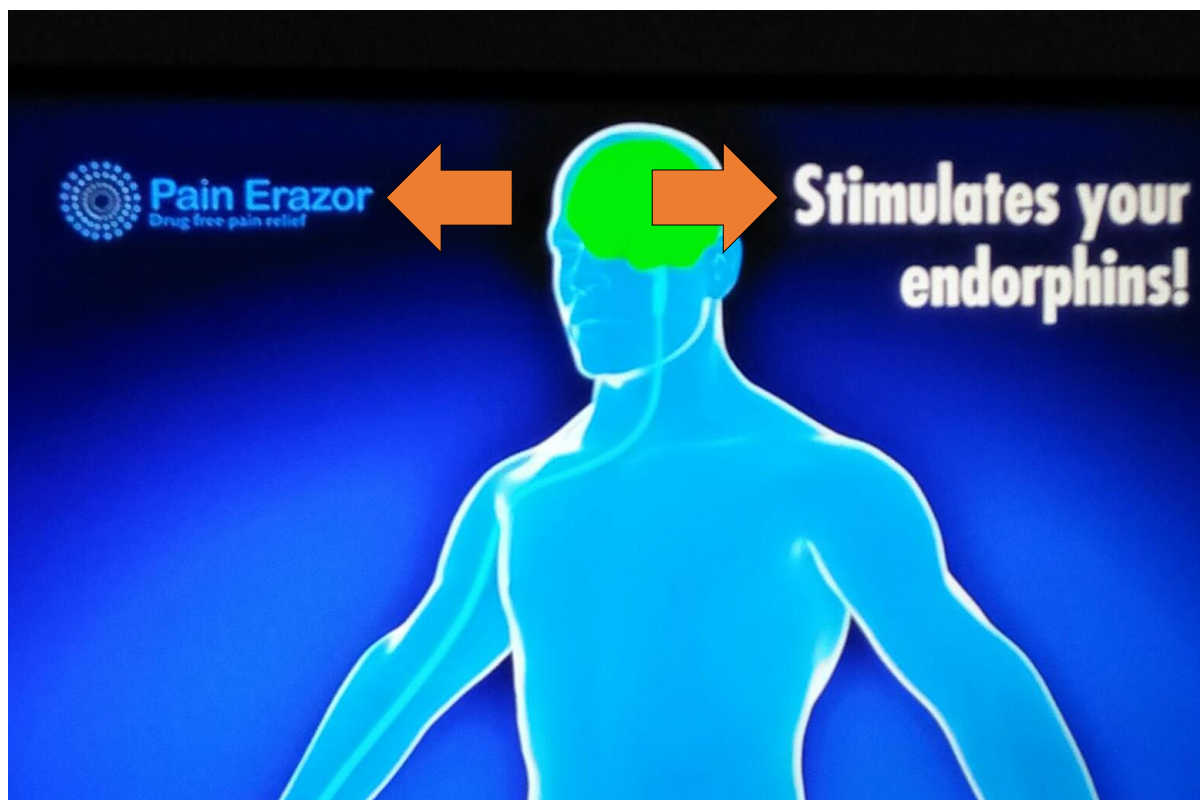
I also dispute the claim that this device stimulates the production of endorphins, to provide relief of chronic and acute pain.

I allege that one or more of the claims (arrowed below), including the product name, breach the Therapeutic Goods Advertising Code 2015, s.4(1)(b), 4(2)(a), 4(2)(b), 4(2)(c), 4(2)(d), 4(2)(f), 4(2)(g), 4(2)(h), 4(2)(i), 4(7) and 6(3).

This and similar products should be removed from the ARTG.

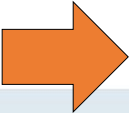
**Date/Edition:** August 3, 2018


## The advertisements:




TV Channel 11 at 9:37 pm 2/8/2018 (seen by Paulina Stehlik [pstehlik@bond.edu.au](mailto:pstehlik@bond.edu.au))

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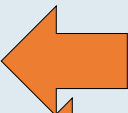
MENU 

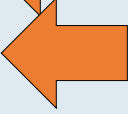


**FREE BOOK WORTH \$49.95** 

Discover the Power of **Drug Free Pain Relief**

**30 DAY RISK FREE TRIAL\***


**DRUG FREE PAIN RELIEF ANYTIME, ANYWHERE** 


Fast, affordable, convenient & extraordinarily effective! 

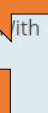
30 Days Risk Free Trail\*

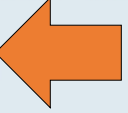
**CALL NOW**

<https://painerazor.com.au/>


**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.

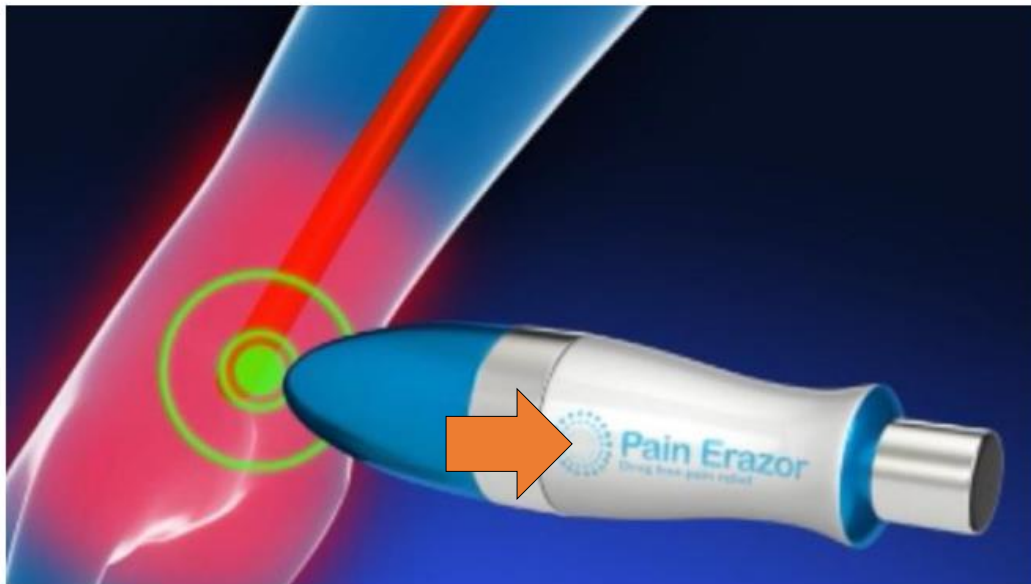
An effective way to soothe and relieve pain without using medication. 

**CALL NOW**



<https://painerazor.com.au/>

## 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://painerazor.com.au/>

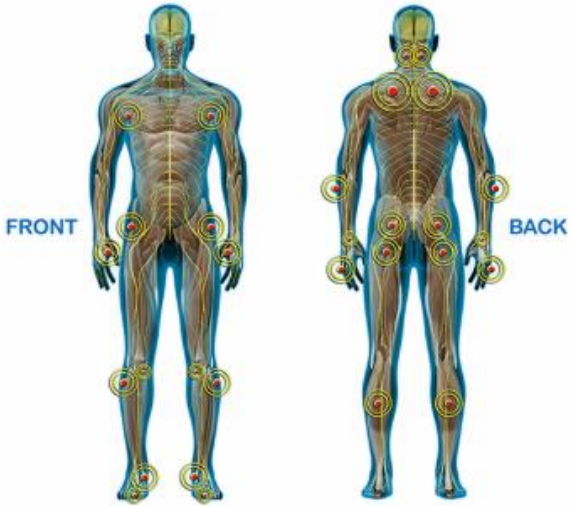
- Natural pain relief - with none of the undesired side-effects of drugs
- Compact & light
- Easy to use
- Fast & effective
- Convenient
- Works without batteries, electrodes or wires
- Pain relief right where you need it - no pills, messy creams or expensive treatments.

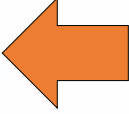
<https://painerazor.com.au/>

MENU



## Trigger Points



Pain Erazor can work for acute or chronic pain including: 

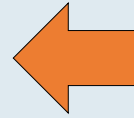
- Muscle Tension
- Nerve Pain
- Neck Soreness
- Foot Discomfort
- Lower Back Pain
- Muscle Cramps
- Knee Pain
- Shoulder Tension

[CALL NOW](#)

<https://painerazor.com.au/>

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## Real Reviews



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 erazor 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](#)

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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](#)

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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](#)

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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://painerazor.com.au/>

# Complaint to TGA: Brand Developers Australia Pty Ltd, Pain Erazor

Dr Ken Harvey MBBS, FRCPA, AM

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School of Public Health and Preventive Medicine

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3 August 2018



**Australian Government**  
**Department of Health**  
 Therapeutic Goods Administration

**Public Summary**

**Summary for ARTG Entry:** 276939 Brand Developers Australia Pty Ltd - Transcutaneous electrical stimulation probe

**ARTG entry for** Medical Device Included Class IIa  
**Sponsor** Brand Developers Australia Pty Ltd  
**Postal Address** PO Box 8084, Tarneit, Melbourne, VIC, 3029  
 Australia  
**ARTG Start Date** 23/06/2016  
**Product category** Medical Device Class IIa  
**Status** Active  
**Approval area** Medical Devices

**Conditions**

- The inclusion of the kind of device in the ARTG is subject to compliance with all conditions placed or imposed on the ARTG entry. Refer Part 4-5, Division 2 (Conditions) of the Therapeutic Goods Act 1989 and Part 5, Division 5.2 (Conditions) of the Therapeutic Goods (Medical Devices) Regulations 2002 for relevant information.
- Breaching conditions of the inclusion related to the device of the kind may lead to suspension or cancellation of the ARTG entry; may be a criminal offence; and civil penalties may apply.

**Manufacturers**

**Name**

Guangzhou Xinbo Electronic CO LTD

**Address**

2nd Bldg Juntuo Tech Industry Park Xinye  
 Dadao Nancun Panyu  
 Guangzhou, Guandong Prov, 511442  
 China

**Products**

**1. Transcutaneous electrical stimulation probe**

<b>Product Type</b>	Single Device Product	<b>Effective date</b>	23/06/2016
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**GMDN** 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.

**Specific Conditions**

No Specific Conditions included on Record

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Public Summary