

2 March 2018

RE: TGA review and consultation on prescription strong (Schedule 8) opioid use and misuse in Australia

The Australian College of Nurse Practitioners (ACNP) welcomes the TGA review and consultation on prescription strong (Schedule 8) opioid use and misuse in Australia. The ACNP is the peak body in Australia for Nurse Practitioners and is the voice for members who work with people with acute and chronic pain and prescribe Schedule 8 medicines. As such, any change to current prescribing arrangements may impact our members and the clients they serve.

Option 3 proposed by the TGA with the suggestion of specialist-only prescribing is of concern to our members. There are a number of specialist Nurse Practitioners working within pain management, however they are not recognised through medical colleges as specialists. As such, Nurse Practitioners who provide vital services in this area may end up being unintended casualties of this process with their clients missing out or having to be sent to other providers which may limit access to crucial services.

The ACNP notes the clarification published on the TGA website on the 27th of January 2018 in response to the concern about GPs not being able to prescribe high dose opioids and that the TGA is working with the AMA, RACGP and other appropriate bodies. The ACNP requests to be part of this consultation as an “appropriate body” representing Nurse Practitioners who work in chronic pain and prescribe high dose opioids. The ACNP is supportive of additional training that may be required to prescribe high dose opioids but holds that this training must be open to all prescribers of high dose opioids, including nurse practitioners.

The ACNP supports options 1, 2 and 8 and has no comment on options 4-7.

It is the view of the ACNP that the key to reducing misuse of opioids in Australia is national, real time monitoring of prescription and supply of opioids.

The ACNP looks forward to working with the TGA and other bodies and colleges on this significant issue.

Kind regards,

