

**Submission to the Therapeutic Goods Administration (Department of Health) Consultation for:
Prescription opioid use and misuse in Australia options for regulatory response**

Opiates play a crucial role in pain management for both humans and other animals. The review should take very seriously the risk that people who legitimately require access to these medications may seek less regulated and more harmful alternatives to meet their pain management requirements.

Restricting prescriptions to specialists presents many complications, which may eliminate access to appropriate pain management for significant portions of the population, and inasmuch further entrench and grow social divisions in health care outcomes. People in rural or regional areas, or people on a low income, in particular, are at particular risk.

Any moves to further restrict access or prescription opportunities should be accompanied by measures to ensure access to appropriately authorised professionals is assured at no cost for every area of Australia, and within a turn-around time which does not exceed the current time it takes for respective areas to access their GP. This could be managed through Primary Health Networks, whose funding regimes already restrict health professionals from charging gap fees and provides a greater degree of control and oversight.

In reviewing medication use in Australia, it is important not to overlook the impact of any changes on the care of non-human animals, as well as the accordant implications to the people who care for them. My veterinarian's capacity to prescribe, and entrust me with the delivery of, buprenorphine to my cat, Jas, was crucial to her palliative care. As a direct result, she lived (with a reasonable quality of life) for a month longer than she otherwise would have; to some, this may not seem significant, but after ten-years of caregiving this was anything but trivial. Her cancer was, for good reason, very unexpected, and her impending death was devastating. The vet's ability to dispense her medication allowed me time to say my goodbyes.

My experience is not isolated, the bond held by many with their pets is significant and well established in the literature. It is imperative this bond is treated with due care to the effect it can have on the wellbeing and mental health of the caregiver, as much as the pet themselves. Any moves which may serve to restrict access to these medications (including delivery by vet only, which would be costly) could prevent animal caregivers from execution of their responsibilities, and cause unnecessary suffering for both parties – especially where the animal in question is also a service animal. Dispensing the small doses required for a reasonable period of time appears relatively low risk, and for the reasons above small animal veterinary access should be protected in any decisions to change accessibility of relevant medications.

The recommendation to increase medical professional awareness of alternative pain relief is appropriate and should be attempted as a first step irrespective of any further intended changes, and ideally before finalisation of any decision to restrict these.

Thank you for considering my input,

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