I am in favour of Option 8 with slight modifications and aditions, as follows:

Option 8: Increase health professional awareness of alternatives to opioids (both S4 and S8 opioids) in the management of chronic pain.

Essentially, the key point is that would like to see an increased health care professional awareness of alternatives to opioids and align them to current clinical guidelines.

The TGA should be encouraged to work with the NPS MedicinesWise and clinical colleges to increase awareness of health practitioners and the uptake of appropriate pain management guidelines in their practices. This could include developing a comprehensive repository of information about the appropriate use of both S4 and S8 opioids.

This could use the active networks established under the Nationally Coordinated Codeine Implementation Working Group. Also the following specific initiatives, which includes some of the suggestions of the Advisory Committee on Medicines suggested in October 2017:

- 1. The introduction of smaller pack sizes for strong opioids that may be prescribed when short-term use is required, such as for pain relief after surgery.
- 2.A review of the approved indications for S8 opioid medicines and align them to current clinical guidelines.
- 3. Working with the Health Technology Assessment and Access Division of the Department of Health to consider PBS prescribing restrictions, such as smaller quantities and the requirement for specialist medical review of non-cancer pain patients prescribed opioids for extended periods.
- 4.. TGA to work with clinical colleges to educate prescribers on judicious use of opioids, treatment de-escalation and the use of non-opioid pain relievers.

5 Also, critical to the success of all these initiatives, is the implementation of a national real-time prescription monitoring system. This should involve the active participation in collaboration with prescribers, of pharmacists, who already have had a great deal of experience over several years, in successfully monitoring real-time medication purchases using their MedsASSISTsystem for tracking the purchase of Codeine-containing products.

Yours Sincerely,

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