

## **Submission to the TGA Consultation: Prescription strong (Schedule 8) opioid use and misuse in Australia – options for a regulatory response**

The TGA Consultation Paper lists the problems on page 8: “6 main outcomes of opioid overuse”. However this list does not include crime and the impact on policing services related to opioid overuse. It is important that the consultation also considers the impact on crime - there is a description of law enforcement-related harms in the National Pharmaceutical Drug Misuse Framework for Action (page 62). This Framework can be found on the National Drug Strategy website:

<http://www.nationaldrugstrategy.gov.au/internet/drugstrategy/Publishing.nsf/content/drug-mu-frm-action>

In considering the likely benefits or costs of proposed options the TGA should also consider the benefits to law enforcement. Options 1-8 for an increased regulatory response are all consistent with the above Framework and would all bring benefits to law enforcement that include restricted availability, reduced diversion to the illicit market and reduced crime associated with the misuse of opioids.

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