We support the role of Therapeutic Goods Administration (TGA) as the independent regulator and accept its decision to make all codeine products prescription only from 1 February 2018.

We are participating in the work of the Nationally Coordinated Codeine Implementation Working Group to ensure consumers are aware of the change and have information about alternate pain management strategies and services.

We also support the need for more education for prescribers on the dangers of codeine to reduce its use. Over-the-counter access to codeine is only part of the problem and without measures to change prescribing habits the problems associated with over use and addiction will continue.

There also needs to be more services available for people with a codeine addiction to help move them away from using codeine and to help them manage any pain issues more effectively.

We join with painAustralia and the Australian Pain Management Association in supporting the full implementation of the National Pain Strategy.

We do not support the proposal from the Pharmacy Guild of Australia and the Pharmaceutical Society of Australia to allow pharmacists to dispense codeine products without a prescription for people with one-off acute pain under certain conditions.

When the proposal to reschedule all codeine products to be prescription-only medicines was first mooted CHF opposed it. We acknowledged that there was a problem with misuse but believed that most people used codeine products responsibly. We argued for other measures to be implemented including: introduction of real time monitoring of sales of codeine through pharmacy e.g the Guild MedAssist program; more education for consumers about potential issue around dependency and addiction; more services for people with addiction and dependency issues to help them move away from codeine and more education for doctors on prescribing codeine products. We acknowledged that if these did not work then the next option would probably be moving to prescription-only.

CHF believes that the scheduling framework which looks at access to medicines in terms of potential risks to consumers and has ensuring consumer safety as its key principle serves Australian consumers well overall. The Therapeutic Goods Administration looked at all the
evidence and made the decision that the harms outweighed the benefits and so codeine should be made prescription only.

CHF supports the role of TGA as the regulator; we believe overall it does an excellent job of ensuring Australians have access to safety and high-quality medicines. We also note that this decision brings Australia into line with most other developed countries. As recently as July 2017 France has moved to make codeine products prescription only. The evidence for harm from codeine and other opioids is growing and their efficacy in assisting with pain management is coming under more and more scrutiny.

The proposal to allow controlled supply by pharmacists without a prescription could be seen to undermine the scheduling framework. Whilst CHF acknowledges there may be a place for looking at ways to improve access to medicines through measures like controlled supply we think this needs to be done in a rigorous and systematic way not just applying it to a specific medicine. The work on this needs to develop a sound evidence base for the need for such a model, look at possible ways it could be implemented and develop some criteria for deciding which medicines might be suitable to be accessed in this way. The review needs to involve all the stakeholders including pharmacists, consumers and doctors.

Much of the messaging around the changes for codeine concentrate on the potential harm it causes and that it is an ineffective pain management tool. Consumers would become very confused after seeing these messages to then hear that codeine products are the way to deal with acute pain. It may also undermine the moves to get consumers to look at a range of pain management approaches, not just medicines.

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