

15 January 2016

Medicines.Scheduling@tga.gov.au

Re: Consultation: Proposed amendments to the Poisons Standard (Codeine)

The Society of Hospital Pharmacists of Australia (SHPA) is the national professional organisation for over 3,000 pharmacists, pharmacists in training, pharmacy technicians and associates working across Australia's health system. SHPA is the only professional pharmacy organisation with a core base of members practising in public and private hospitals and other health services.

SHPA is committed to facilitating the safe and effective use of medicines, which is the core responsibility of pharmacists, especially in hospitals. SHPA believes that any changes to the scheduling of medicines should be driven by evidence and underpinned by the principles of patient safety.

SHPA supports:

- option (b) for Schedule 2 (cough and cold medicine preparations); and
- option (c) for Schedule 3 (including, but not limited to codeine containing analgesics).

SHPA believes if the final decisions are to not up-schedule products containing codeine to Schedule 4, and reduce the pack sizes to not more than 3 days' supply, we suggest the following additional requirements:

- these products are supplied as pharmacist only medicines and are dispensed, individually labelled and recorded by the pharmacist; and
- are included in a national *Electronic Recording and Reporting of Controlled Drugs (ERRCD)* system.

If you would like to discuss the issues raised in this submission or require further information, please contact us (shpa@shpa.org.au or 03 9486 0177)

Yours sincerely



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Chief Executive Officer

The Society of Hospital Pharmacists of Australia

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