



24 February 2023

Advisory Committee on Medicines Scheduling (ACMS)
Department of Health and Aged Care,
Therapeutic Goods Administration
PO Box 100, Woden ACT 2606
Via email: medicines.scheduling@health.gov.au

Dear Advisory Committee on Medicines Scheduling (ACMS),

Re: Public consultation on interim decisions to amend the Poisons Standard – ACMS #40 November 2022 (paracetamol)

The Royal Australian College of General Practitioners (RACGP) thanks the Therapeutic Goods Administration (TGA) for the opportunity to provide comment on the following interim decisions to amend the Poisons Standard in relation to paracetamol.

Paracetamol pack sizes

As per our [submission](#) dated 17 October 2022, the RACGP supports the reduction of pack sizes of paracetamol available in pharmacies and supermarkets. However, the changes proposed in the TGA's interim decision is unlikely to significantly impact the harms from overdose of paracetamol. Given that overdoses mostly occur from available stockpiles in the home, the small reduction in pack size is unlikely to reduce the incidence of paracetamol overdoses in Australia. The RACGP recommends pack sizes be reduced further to make an impact on stockpiled medications.

Paracetamol availability

The RACGP disagrees with differing front-of-store pack sizes between pharmacies and supermarkets. Given that non-pharmacist staff are unable to provide advice on the use of medications, this setting is not any safer than supermarkets or other convenience stores where paracetamol is sold.

Modified release paracetamol

As per our [submission](#) dated 17 October 2022, the RACGP recommends the TGA up-schedule modified release paracetamol to prescription-only. For acute pain, normal paracetamol is more appropriate. There is an overuse of modified release paracetamol for conditions for which there is insufficient evidence of benefit, such as osteoarthritis and back pain. Additionally, treating overdose from modified release paracetamol is more difficult than normal paracetamol. This due to the particular pharmacodynamics of modified release paracetamol.

Additionally, further support should be provided for GPs to undertake chronic pain consultations and medication reviews for patients who are taking pain medications, to ensure these medications are being used safely and to identify opportunities for deprescribing and non-drug interventions.

Thank you again for the opportunity to provide a submission to this consultation. If you have any questions please contact Mr Stephan Groombridge, National Manager, Practice Management Standards & Quality Care at stephan.groombridge@racgp.org.au or 03 8699 0544.



RACGP
Royal Australian College
of General Practitioners

Healthy Profession.
Healthy Australia.

Yours sincerely

Dr Nicole Higgins
President