

20 September 2023

Vaping Reform Team
Australian Government
Department of Health and Aged Care
Therapeutic Goods Administration
P.O. Box 100 Woden ACT 2606
Via Consultation Hub and Email: nvp@health.gov.au

Dear Secretariat

Re: Proposed reforms to the regulation of vapes

The Royal Australian College of General Practitioners thanks the Therapeutic Goods Administration for the opportunity to comment on the consultation paper *Proposed reforms to the regulation of vapes, September 2023*. The RACGP has previously provided detailed comment on the TGA's [Potential reforms to the regulation of nicotine vaping products: Consultation paper, November 2022](#) and supports further endeavours to strengthen the implementation of the prescription only model for nicotine vaping products.

In response to the current consultation, the RACGP notes the challenges of addressing broader issues such as border control, importation requirements, regulation, manufacturing and supply issues are critical, but lie outside of the RACGP's scope.

The RACGP provides specific feedback is provided on questions in *Proposal 2 – Changes to market accessibility requirements, including better regulation of device components* (in particular, questions 9 to 12) as this has the most direct impact on general practice prescribing. The remaining survey questions have been completed where applicable, via the TGA Consultation Hub.

Question 9 Do you support the proposed access to vapes under the SAS C notification system?

The RACGP supports the proposed access to vapes under the SAS C notification system, as this would likely streamline the prescribing process, by removing the administrative step of requiring approvals to be provided to pharmacies in order for prescriptions to be dispensed.

Question 9a What impact would this pathway have on facilitating patient access to therapeutic vapes?

This simplified, streamlined process may increase the willingness of general practitioners (GPs) to prescribe vapes to patients trying to quit smoking and thereby increase the likelihood of maintaining the ongoing therapeutic support critical to quitting.

Question 10 For prescribers, would the proposed new pathway likely change your approach to prescribing therapeutic vapes? How?

The more streamlined approach may mean less administrative burden on GPs when prescribing. It will be equally important to ensure accountability is able to be maintained throughout the reporting process, without an additional administrative burden.

Question 11 For prescribers, which access pathway (SAS B, SAS C, or AP) would you envisage using to prescribe therapeutic vapes?

The RACGP supports either SAS C, or a streamlined AP scheme. To facilitate all GPs to be able to prescribe vapes as one of the options for smoking cessation, any additional administrative burden should be avoided. GPs' prescriber numbers should be automatically assigned approved prescriber status and information about dispensed vapes should be collected from the point of dispensing.

Question 12 For prescribers, would integration of SAS or AP applications or notifications into existing clinical software systems ease the administrative burden and/or encourage you to use the new pathway?

The RACGP supports the integration of prescribing applications into clinical practice software. Some initial investment of time and education would be required to support GPs in taking up this change. The benefits of integrating prescribing into clinical software include ease of prescribing and more ready access to prescribing data for clinical audit and reporting purposes.

The RACGP thanks the TGA for the opportunity to provide input on this very important consultation. If you have any queries regarding this submission, please contact Mr Stephan Groombridge, National Manager, Practice Management, Standards and Quality Care on (03) 8699 0544 or at Stephan.groombridge@racgp.org.au .

Yours sincerely



Dr Nicole Higgins
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