

6 November 2020

Secretary
Therapeutic Goods Administration
GPO Box 9848
Canberra ACT 2601

Email: medicines.scheduling@health.gov.au

Dear Secretary,

Re: Interim decision to amend the current Poisons Standard in relation to nicotine

The Royal Australian College of General Practitioners (RACGP) thanks the Therapeutic Goods Administration for the opportunity to comment on the interim decision to amend the current Poisons Standard in relation to nicotine. The RACGP supports the proposed amendments. The evidence based approach to arrive at the interim decision places all nicotine-containing products into Schedule 4. The only exceptions are tobacco packaged for smoking (cigarettes) and nicotine in preparations for mucosal or transdermal administration for use as an aid in withdrawal from tobacco smoking. This proposed amendment makes heat-not-burn, e-cigarette nicotine liquid, snuff, chewing tobacco, and novel products all unavailable for legal importation or sale.

The interim decision will assist in containing the use of nicotine containing e-cigarettes to those who want to use them for smoking cessation purposes and therefore reduce:

- the uptake by non-smokers
- dual use with continued tobacco smoking
- long-term use

Whilst the RACGP supports this interim decision, it is noted that this decision will place considerable responsibility on general practitioners (GPs) to ensure there is an evidence-informed, shared decision-making process whereby the patient is aware of the following important points about e-cigarettes:

- no tested and approved e-cigarette products are available
- the long-term health effects of vaping are unknown
- possession of nicotine-containing liquid without a prescription is illegal
- in order to maximise possible benefit and minimise risk of harms, only short-term use is recommended
- dual use (i.e. with continued tobacco smoking) needs to be avoided.

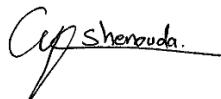
Given the responsibility being placed on GPs there needs to be access to clinician and consumer education. Community education is vital, so people do not anticipate being able to simply obtain a prescription from their GP to continue use of nicotine containing e-cigarettes indefinitely or for purposes other than cessation.

The regulatory processes that control access to nicotine for e-cigarettes, such as the Special Access Scheme, also need to be efficient and easy to understand and navigate.

The RACGP recently launched [Supporting smoking cessation: A guide for health professionals](#), which includes an evidence review of the use of electronic cigarettes (e-cigarettes) for smoking cessation aid.

The RACGP thanks the Department of Health for the opportunity to submit a response. If you have any queries please contact Mr Stephan Groombridge, Manager, eHealth and Quality Care on (03) 8669-0544 or at stephan.groombridge@racgp.org.au

Yours sincerely



Dr Ayman Shenouda
Acting President