

6 February 2020

Ms Glenys Beauchamp  
GPO Box 9848  
Canberra ACT 2601  
Email: [medicines.scheduling@health.gov.au](mailto:medicines.scheduling@health.gov.au)

Dear Ms Beauchamp,

**Re: Proposed amendments to the Poisons Standard (Medicines/Chemicals) – Application to the Therapeutic Goods Administration by Philip Morris International to make tobacco prepared and packaged for heating available in Australia**

The Royal Australian College of General Practitioners welcomes the opportunity to make a submission on the proposed amendments to the Poisons Standard (Medicines/Chemicals).

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 promotion of heat not burn tobacco products as a safer alternative to smoking combustible tobacco, or a potential cessation aid, has many parallels to e-cigarettes. Their introduction is likely to follow a similar trajectory and raise many of the same concerns.

As with e-cigarettes, the long-term risks have not been established and more research is required to ascertain their safety. Claims that heat not burn products pose a lower risk to health due to their milder exposure to toxicants have recently been refuted.<sup>1</sup> This assertion has similarities to earlier (now illegal) marketing campaigns by tobacco companies that promoted light and mild cigarettes and, filtered and low-tar cigarettes, as posing a lower health risk.

The popularity of e-cigarettes in spite of these safety concerns and the fact that obtaining nicotine liquid without prescription is illegal, is deeply worrying. The RACGP is, therefore, strongly recommending that the Therapeutic Goods Administration does not approve the proposed amendments and adopts a protective and precautionary approach to heat not burn products until further credible and long-term evidence can be accumulated on health impacts.

The RACGP thanks the Department of Health for the opportunity to comment. 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](mailto:stephan.groombridge@racgp.org.au)

Yours sincerely



**Dr Harry Nespolon**  
President

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## Reference

<sup>1</sup> Popova L, Lempert LK, Glantz SA. Tob Control 2018;27:s87-s95