

2 June 2022

Therapeutic Goods Administration  
PO Box 100  
Woden ACT 2606

Via email: [medicines.scheduling@health.gov.au](mailto:medicines.scheduling@health.gov.au)

Dear Medicines Scheduling secretariat,

**Re: Proposed amendments to the Poisons Standard**

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide comments on the proposed amendments to the poisons standard. We provide comment on the amendments to Item 1.2 - Budesonide and Item 2.2 - Hydroxypinacolone retinoate.

**Item 1.2 – Budesonide**

The RACGP believes that the proposal to change the scheduling from Schedule 4 to Schedule 3 is harmful for patients given that pharmacists are not clinically trained to diagnose and treat asthma, and there is potential for misdiagnosis that can risk patient safety. We therefore recommend that Budesonide remains under Schedule 4 to only be available by prescription from a clinician with suitable training, such as general practitioners (GPs). Due to their central care coordination role, skills and knowledge, GPs are best placed to manage asthma and prescribe patients with the medication/s they require. GPs will prepare asthma management plans in the context of the patient's medical history. Patient care becomes fragmented when similar services are offered by multiple health professionals.

Asthma is a chronic condition which requires a clinical diagnosis. This includes taking a medical history, examination of the respiratory system, performing and interpreting spirometry, and undertaking appropriate shared decision making with the patient. Other potential causes of respiratory symptoms, such as shortness of breath, wheeze or cough, will also need to be considered.

**Item 2.2 – Hydroxypinacolone retinoate**

The RACGP does not support the application to amend the Schedule 4 entry as the topical preparation of hydroxypinacolone retinoate can be used for acne treatment. The medication listing currently includes a warning - 'May cause birth defects'. As some patients given the topical preparation may be of child-bearing age, prescribing of this medication is best managed in general practice.



Royal Australian College of General Practitioners

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Thank you again for the opportunity to provide feedback on the proposed amendments to the poisons standard. For any enquiries regarding this letter, please contact Stephan Groombridge, eHealth and Quality Care Manager on 03 8699 0544 or [stephan.groombridge@racgp.org.au](mailto:stephan.groombridge@racgp.org.au).

Yours sincerely

Dr Karen Price  
President