

HEALTH PROTECTION DIRECTORATE

National Centre for Education and Training on Addiction (NCETA)

Flinders University

GPO Box 2100

Adelaide SA 5001

Dear Sir/Madam

Re: National Pharmaceutical Drug Misuse Strategy Submission

The National Pharmaceutical Drug Misuse Strategy (NPDMS) discussion paper questions relevant to this Unit are Questions 6, 7, 15, and 17. These questions have been addressed as follows.

Question 6

What role do police agencies and other law enforcement agencies have in responding to problems of pharmaceutical drug misuse?

State Health Regulatory Agencies have the role of:

- monitoring the prescribing and dispensing of pharmaceutical drugs of interest by Health Practitioners
- developing and implementing mechanisms, including via legislation, to identify inappropriate prescribing and supply of pharmaceutical drugs of interest
- investigating matters relating to alleged inappropriate prescribing and supply of pharmaceutical drugs of interest by Health Practitioners
- liaising with the State Police Service with regard to investigations of pharmaceutical drug misuse involving health practitioners
- providing information to State Police Service officers in relation to patients seeking pharmaceutical drugs for misuse
- Educating health practitioners when it is identified that patients are seeking pharmaceutical drugs for misuse
- Liaising and providing information to the Australian Health Practitioner Regulation Agency (AHPRA) when outcomes of investigations indicate inappropriate prescribing or dispensing of pharmaceutical drugs
- Liaising with the Pharmacy Guild of Australia in relation to the use of Project Stop to identify inappropriate supply of the pharmaceutical drug, Pseudoephedrine (PSE) by health practitioners.

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Police agencies have the role of:

- investigating matters pertaining to potential breaches of laws such as the Criminal Code Act and the Drugs Misuse Act in Queensland in relation to:
 - unlawful pharmaceutical drug possession and supply
 - identification of clandestine laboratories, where pharmaceutical drugs are used as precursors in the manufacture of illicit substances
- enforcing the above laws when breaches are identified in relation to unlawful possession and supply of pharmaceutical drugs or the identification of clandestine laboratories.
- liaising with health authorities to obtain and provide information that will assist with investigations described above.
- involvement in the clean-up operation of clandestine laboratories (where pharmaceutical drugs are used as precursors to manufacture illicit substances) in association with State Health Authorities.

The Australian Health Practitioner Regulation Agency (AHPRA) has the role of:

- liaising and sharing information with State Health Authorities in relation to registrants (health practitioners) involved in inappropriate prescribing, supply or use of pharmaceutical drugs
- investigating registrants and enforcing legislation as outcomes of investigations in relation to inappropriate, prescribing, supply or use of pharmaceutical drugs.

Question 7

To what extent are pharmaceutical drug misuse problems impacting on policing agencies in different jurisdictions

Pharmaceutical drug misuse problems appear to be on the rise and hence this impacts increasingly on resources. This Unit was advised by the State Drug Investigation Unit, Queensland Police Service that over 300 clandestine laboratories were identified in 2010. These clandestine laboratories involved the production of methamphetamines, using the pharmaceutical drug PSE as the precursor chemical.

As a result of identifying increases in the diversion of pharmaceutical drugs such as PSE and other drugs of interest such as anabolic steroid hormones, Queensland Health established the PSE Enforcement Taskforce in late 2006. This Taskforce is dedicated to investigating matters pertaining to the inappropriate prescribing and supply of these pharmaceutical drugs by health practitioners.

The taskforce utilises an intelligence-driven model to prioritise and undertake investigations relating to the inappropriate prescribing and supply of pharmaceutical drugs.

The impacts of pharmaceutical drug misuse problems on policing agencies are compounded in areas close to State/Territory borders where:

- policing authorities do not have jurisdiction “over the border” and
- jurisdictional legislative requirements concerning the prescribing and supply of pharmaceutical drugs may vary.

In these instances additional resources of counterpart policing authorities are required to undertake investigations.

Question 15

How effective is Australia's current approach to the regulation and monitoring of these medications and how could the current approach be improved?

The effectiveness of Australia's approach to regulation and monitoring of pharmaceutical drugs is currently limited by the lack of:

1. the availability of an Australia-wide coordinated real-time information database, similar to Project Stop, which includes information relating to pharmaceutical drugs prescribed and dispensed to patients and is accessible to doctors, pharmacists and regulators. Such a system is described in the NPDMS discussion paper as a fourth generation Coordinated Medication Management System (CMMS).
2. resources dedicated in relation to regulation and monitoring of the prescribing and supply of these medications. Perhaps the keeping of quantifiable statistical information demonstrating the rise of pharmaceutical drug misuse will provide an evidence-base for greater investment into the regulation and monitoring of these medications.

Question 17

Are there any measures that could be introduced in the short term that would enhance our ability to monitor the prescription and dispensing of these medications?

The NPDMS discussion paper indicates that "*Tasmania is moving towards finalisation a fourth generation CMMS*". Once finalised if this could be rolled out nationally and used consistently, this would greatly enhance Australia's ability to monitor the prescription and dispensing of these medications.

In addition, greater investment into auditing and educating health practitioners would also enhance our ability to monitor the prescribing and dispensing of these medications.