27 May 2011

Pharmaceutical Drug Misuse Strategy
National Centre for Education and Training on Addiction (NCETA)
Flinders University
GPO Box 2100
Adelaide SA 5001

Dear Sir/Madam

National Pharmaceutical Drug Misuse Strategy Discussion Paper

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide input into the National Centre for Education and Training on Addiction (NCETA)’s *A Matter of Balance – A background discussion paper to support the development of the National Pharmaceutical Drug Misuse Strategy (NPDMS)* (the Discussion Paper).

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

CHF has consulted with our members on the Discussion Paper and some brief comments are provided below. We have also provided comments to NCETA on the NPDMS literature review and generally found it to be an excellent resource for consumers and other stakeholders. CHF welcomes the NPDMS and is supportive of measures that adhere to Quality Use of Medicines (QUM) principles.

The first of the five key principles that underpin Australia’s National Strategy for the Quality Use of Medicines (NSQUM), as mentioned in the Discussion Paper, is the importance of consumers. CHF welcomes the inclusion of consumers throughout the NPDMS at a range of levels. The NPDMS must be consumer-focused and must include a variety of strategies that ensure ongoing consumer involvement, engagement and inclusion in the Strategy.

A fairly comprehensive list of key stakeholders has been identified in the Discussion Paper as being relevant to the NPDMS. Although the paper lists ‘all Australian citizens’ and ‘individuals suffering from chronic pain, mental health problems and social disadvantage and their respective advocacy groups’, CHF argues that it is important to clearly identify and involve health consumer organisations (such as CHF) to ensure that consumer and carer perspectives are genuinely considered during the development and implementation of the NPDMS. Specifically seeking and listening to the views of consumers will work towards understanding and minimising prescription drug misuse and achieving the best outcomes for all Australians.
It is essential that all groups within the community are targeted for inclusion when attempting to minimise drug misuse and increase awareness of this issue. As mentioned in the Discussion Paper, consumers living in rural and remote areas and those experiencing social disadvantage are disproportionately affected by levels of harm associated with pharmaceutical drug-related problems. It is therefore essential that these groups of consumers are specifically targeted as part of the NPDMS.

CHF argues that the regulation and monitoring of the prescription and dispensing of the pharmaceuticals included in the Strategy should be maintained or strengthened as part of the NPDMS. This is particularly important in light of the absence of structures that link prescribers, pharmacists and regulators. CHF would support the introduction of Coordinated Medication Management Systems (CMMS) as these systems would protect consumers by identifying potential drug interactions, identify medication duplication via multiple prescribers and block reported stolen, forged and altered prescriptions. However, if upgrading to a CMMS model across all jurisdictions, the privacy of patient information must be protected. Issues with the Fluvax vaccine in 2010 highlight the importance of real-time reporting systems to ensure consumer safety. The recently released independent report, *Review of the management of adverse effects associated with Panvax and Fluvax*, discusses real time reporting mechanisms that are in place for vaccines, and how these can be improved. The report is available at http://immunise.health.gov.au/internet/immunise/publishing.nsf/Content/adverse-event.

CHF has a strong interest in the ethical promotion of therapeutic goods. Our members have expressed concerns over many years about promotion of medicines and the lack of a level playing field across the therapeutic goods sector regarding the requirements and enforcement of self-regulatory codes of conduct. CHF has recently been involved in the review of the promotion of therapeutic goods in Australia and has emphasised the importance of ensuring ethical promotion of therapeutic goods in line with QUM principles. CHF would support the introduction of regulations that support the minimisation of misuse of pharmaceuticals. A Working Group on the Promotion of Therapeutic Products was established in 2010, and its report, which should be publicly released soon, is likely to be highly relevant when considering how regulations for promotion can support the minimisation of pharmaceuticals misuse.

CHF acknowledges that the misuse of pharmaceutical drugs in Australia is a growing problem that, due to its complexity, needs to be responded to at a variety of levels. We welcome the Discussion Paper as an important step in developing and implementing the NPDMS.

We appreciate the opportunity to comment on the Discussion Paper and to be involved in the NPDMS and we would be interested in participating in future consultations on this issue. If you have any questions or would like to discuss this further, please contact CHF Project Officer, Ms Sarah Watt or on (02) 6273 5444.

Yours sincerely

Carol Bennett  
CHIEF EXECUTIVE OFFICER