

Therapeutic Goods Administration (TGA)

23 February 2023

Re: CONSULTATION: Public consultation on interim decisions to amend the Poisons Standard - ACMS #40 NOVEMBER 2022 (paracetamol)

To whom it may concern,

Painaustralia appreciates the opportunity to provide feedback on the TGA delegate's interim decision regarding amendments to the Poisons Standard in relation to paracetamol from the November meeting of 2022.

While Painaustralia supports the sensible recommendation to not upschedule paracetamol, place age restrictions to purchase or to limit the number of packets that can be bought at a supermarket or pharmacy we are disappointed by the interim decision to reduce the available pack sizes of paracetamol to Australians living with pain.

We hope that you find the following feedback useful in understanding how the decision to not upschedule paracetamol will assist Australians living with chronic pain, but also that the reduction in available pack sizes without pharmacist oversight will negatively impact these same Australians. In addition to the issues raised in our previous submission¹, below are further items for consideration by the TGA arising from the interim decision.

Painaustralia is the national peak organisation working to improve the lives of people with chronic pain. Our aim is to have their voice heard in and co-developing all health policy and in decision making.

Chronic pain is highly prevalent in Australia, affecting one in five Australian adults.² The majority of those who live with chronic pain are women with 1.8 million women dealing daily with the challenges presented by chronic pain. Evidently, we welcome the delegate's interim decision not to recommend age restrictions on the purchasing of over-the-counter analgesics.

¹ <https://www.painaustralia.org.au/static/uploads/files/paracetamol.pdf>.

² Blyth FM, March LM, Brnabic AJM, Jorm LR, Williamson M, Cousins MJ. Chronic pain in Australia: A prevalence study. Pain. 2001;89(2):127-34. Available from: <https://www.ncbi.nlm.nih.gov/pubmed/11166468>

Restricting young people under the age of 18 would greatly impact young women who use paracetamol for chronic pelvic pain or young people who care for their parents or grandparents. For those who live out of home because they do not have anywhere else to live this would have been a disaster for them.

Painaustralia is also supportive of the interim decision not to limit the number of packets that can be purchased as any decision to do so would create an impediment to self-management of chronic pain that would be burdensome for consumers, particularly those who have low incomes or with limited transport options including those who live in rural and remote areas. Chronic pain is a burden disproportionately felt by rural and remote Australians who are more likely to be afflicted by chronic pain, but less able to access healthcare than Australians living in major cities.³ Rural and remote-based industries such as agriculture, mining, forestry and fishing, have higher incidences of injury, and when combined with poor access to health services this leads to more untreated pain.⁴

The TGA delegate's decision to not upschedule modified release paracetamol shows a consideration for those who live with chronic pain and the challenges they face to obtain treatment options for their pain. Paracetamol is one of the most affordable and most widely used medications for the 3.4 million Australians managing their chronic pain.⁵⁶ This decision also demonstrates an understanding of the financial and practical burden that would be felt by rural and lower income Australians if access to highly effective and safe pain medication was made more difficult through upscheduling. Having to visit a GP, which is already difficult to access and the associated costs, would only increase the burden on those with chronic pain. This decision not to upschedule was equally positively received by Australian consumers, who, through Painaustralia's Facebook page, expressed sentiments of relief that paracetamol was still readily accessible to them to manage their chronic pain. One such respondent commented "Well done! Basic pain relief should be accessible for all chronic pain sufferers".⁷

³ Painaustralia. Rural & Remote 2021. Accessed on 13 February. Available from: <https://www.painaustralia.org.au/about-pain/who-it-affects-pages-2021/rural-remote-2021>

⁴ National Rural Health Alliance. Pain – chronic issue in rural Australia. September 2013. Available from: <https://www.ruralhealth.org.au/news/pain-chronic-issue-rural-australia#:~:text=Chronic%20pain%20is%20more%20prevalent%20in%20rural%20and,to%20health%20services%2C%20leads%20to%20more%20untreated%20pain.>

⁵ Saragiotto, Bruno & Shaheed, Christina & Maher, Chris. (2019). Paracetamol for pain in adults. *BMJ*. 367. 16693. 10.1136/bmj.16693.

⁶ Painaustralia. Paracetamol: Submission on proposed amendments to restrict access. October 2022. Available from: <https://www.painaustralia.org.au/static/uploads/files/paracetamol.pdf>

⁷ Painaustralia (n.d.). Home [Facebook page]. Facebook. Retrieved February 13, 2023, from: <https://www.facebook.com/search/top?q=painaustralia>

However, Painaustralia does not feel that the same consideration was given to the negative effects of limiting the pack sizes of paracetamol. Restricting the pack sizes of paracetamol may result in a segment of these Australians needing to visit the supermarket or pharmacist multiple times a week or more.

Cutting the maximum size of packs available for general sale via supermarkets and convenience stores from 20 to 16 tablets or capsules would provide only three days pain relief. Not everyone lives close to shops and those on low incomes often can only afford to buy paracetamol on payday. For those who have low incomes, have limited transport options, and/or live in rural and remote areas, this creates an impediment to self-management of their chronic pain. Consumers living in rural and remote areas should not be forced to travel hundreds of extra kilometres a week just to obtain basic pain relief or charged more due to pack size reductions. Half a tank of fuel at today's prices could cost up to \$60 and increase financial burden to these Australians, including through excess travel and lost time. The impacts on changes to the retail price of paracetamol due to these changes are yet to be established but it is expected that the cost of an individual tablet is likely to increase because packaging and shipping for each packet will cost the manufacturer the same as a larger pack.

It is important to reiterate that the decision to reduce pack sizes of paracetamol is overwhelmingly not supported by consumers. In our survey of 100 consumers who live with chronic pain, only 25 per cent of respondents agreed with the proposal to reduce pack sizes.

Responses to a recent Painaustralia Facebook post about the TGA's interim decision to reduce pack sizes has also been negatively received by consumers.

“Stupid idea to reduce pack sizes. This will adversely affect those in the bush who travel long distances to the nearest shop. Typical bureaucratic decision making by city folk who have no lived experience outside of suburbia.”

- Consumer comment.

“It’s good that paracetamol has not been upscheduled, but it was only ever Panadol osteo that was going to be on prescription. Reducing pack sizes is not a win, it’s a big loss. It won’t reduce overdoses, but it will make life more difficult for those living with mild/mod chronic pain. It will just increase the cost for people who are already struggling.”

- Consumer comment.

“The more important decision I feel is the one to cut back the larger packs at pharmacies!!! It’s bad enough that the 100 pack of Panamax or whatever has gone up to \$3 & is never on special anymore, making them be a pharmacist medicine will definitely skyrocket the price, & lead to less access for people who need them! (& \$3 might not seem much, but when it’s on top of multiple other meds, food prices going up each week, etc.....) It’s easier to buy alcohol than medicine!!”

- Consumer comment.

“We have a 100+ km round trip to the nearest shop. Small packages of anything are inconvenient bulk packaging of most things are better. There are people who have larger distances to travel and like us probably go to town either once a fortnight or less often. It’s bureaucrats who live in big cities and have no life experience outside those cities who make stupid rules that negatively impact those who live in the bush, especially those of us on below poverty line incomes.”

- Consumer comment.

Summary

Painaustralia supports the delegate’s interim decision to not upschedule modified release paracetamol, not place age restrictions on purchasing of paracetamol or limit the number of packets that can be bought and urges the TGA to adopt these aspects of the delegate’s decision when it is considered in April this year.

However, we do not support the decrease in pack size availability, and if the price per tablet is increased it will increase the financial burden for, and negatively affect, many Australians living with chronic pain, especially those living in rural and remote Australia.

We would welcome the opportunity to discuss our position further and we would welcome a much-needed discussion about the safe storage of medicines at home, going to the original stated intention of keeping young people safe from overdose using paracetamol or misusing any medications in the home.

Yours Sincerely,

A handwritten signature in black ink that reads "Giulia Jones .". The signature is written in a cursive, flowing style.

Giulia Jones

Painaustralia CEO