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State Development, Natural Resources, and Agricultural  
Industry Development  
**Via email:** [SDNRAIDC@parliament.qld.gov.au](mailto:SDNRAIDC@parliament.qld.gov.au)

To the Chair of the Committee

Thank you for providing AMA Queensland with the opportunity to provide a submission to the State Development, Natural Resources, and Agricultural Industry Development Committee about changes to Medicines and Poisons Bill 2019 and the Therapeutic Goods Administration Bill 2019.

AMA Queensland is the state's peak medical advocacy group, representing over 6000 medical practitioners across Queensland and throughout all levels of the health system.

AMA Queensland is strongly supportive of the changes to the **Medicines and Poisons Bill 2019** including the Real Time Prescription Monitoring (RTPM) scheme, including the requirement for prescribers to obtain an approval before prescription of controlled drugs (referred to in the Bill as S8 medicines) and particular S4 medicines to drug dependent people.

Our support for the new system is based on the increasing rate of controlled drug prescriptions dispensed in Queensland, which AMA Queensland understands is increasing at a rate of 12% per annum, and the social, psychological and economic damage drug dependent people cause in Queensland communities.

AMA Queensland is also supportive of the engagement and education strategy to support understanding and uptake of the database by end users such as prescribers and dispensers and we offer our assistance to Queensland Health with the distribution of this information to our members.

AMA Queensland does however, have some concerns regarding the requirement for prescribers to check the monitored medicines database to see if the person has previously been prescribed or supplied a monitored medicine and the penalty for failure to check the database:

- i. Our members are concerned with the double log-in requirements of the new system for prescribers to obtain an approval before prescribing some S4 and S8 medicines and how feasible this will be in busy practices


- ii. our members have also expressed concern about the possibility of an increase in assaults against General Practitioners due to this new requirement and we recently wrote to the Health Minister expressing this concern
- iii. our members question whether the new ICT system (which doctors will have to log in to) will easily communicate with existing IT systems used in GP practices and the “seamless” application of this new requirement
- iv. AMA Queensland notes the 12-month phase-in period before penalties will be applied for not seeking an approval and will be seeking information from Queensland Health about the monitoring of this phase-in period.

AMA Queensland supports the revised regulatory framework which streamlines the requirements for prescribing medicinal cannabis in Queensland by enabling non-specialist medical practitioners to prescribe it without the need for approval from Queensland Health on the following bases:

- i. That before medicinal cannabis is prescribed, the General Practitioner takes into consideration the patient’s medical history, ensuring there will be no interactions with current medications taken by the patient, considering the current evidence demonstrating the conditions in which medical cannabis may have a therapeutic benefit, and is involved in the ongoing monitoring of use and the effect of medicinal cannabis for the condition for which it was prescribed.
- ii. That doctors undertake the available training in prescribing medicinal cannabis before providing this service to their patients – the AMA Queensland supports quality prescribing, to this end, we will ensure our members are aware that training is available in prescribing medicinal cannabis and we’ll encourage their involvement.

If you require further information or assistance in this matter, please contact Jeff Allen on (07) 3872 2262 or email [policy@amaq.com.au](mailto:policy@amaq.com.au).

Yours sincerely



Dr Dilip Dhupelia  
**President**  
**Australian Medical Association Queensland**