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Via email: CP_ESO@health.qld.gov.au

Dear Assoc Prof Motamarri

Thank you for providing AMA Queensland with the opportunity to provide feedback on proposed changes to the Queensland Opioid Treatment Program (QOTP) policy.

AMA Queensland is the state's peak medical advocacy group, representing over 9600 medical practitioners across Queensland and throughout all levels of the health system.

There are a number of areas about which AMA Queensland provides comment. Firstly, AMA Queensland believes the proposed changes are sensible. There are not enough willing QOTP prescribers and the new sub categories of interim and buprenorphine-naloxone only prescribers are likely to affect a small increase in uptake amongst GPs, who may feel more supported, and with buprenorphine-naloxone being safer and easier for less experienced prescribers to manage than methadone.

Secondly, the proposed Interim supervised QOTP prescriber, referred to on page 2 (a medical practitioner on rotation in Hospital and Health Service AOD Service, while under the supervision of an experienced level 1 full QOTP prescriber)" refers only to a "medical practitioner" whereas a full QOTP prescriber (existing), referred to on page 1, can be a medical or nurse practitioner. AMA Queensland reads this to infer that there is no similar pathway for nurse practitioners. Is this intentional?

Thirdly, AMA Queensland believes the online prescriber course should be the minimum benchmark for doctors/nurse practitioners wishing to prescribe QOTP medications, including doctors in shared care. It is important that the level of knowledge about opioid addiction and the pharmacology of buprenorphine and methadone is understood before prescribing.

Finally, AMA Queensland considers that there should be consistency of rules, regulations, policies and processes between states and territories for prescribing opioids. In this regard, we encourage Queensland Health to lobby for a nationalisation of the health system with rules, regulations, policies and consistency of processes across all state and territory borders.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Dilip Dhupelia". The signature is written in a cursive style and is enclosed within a simple rectangular box.

Dr Dilip Dhupelia
President
Australian Medical Association Queensland