28 May 2021

Adjunct Professor Debora Picone AO
Australian Commission on Safety and Quality in Health Care

By email to: steve.waller@safetyandquality.gov.au

Dear Adjunct Professor Picone

Re: National Opioid Analgesic Stewardship Program – Discussion Paper

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to provide input to the National Opioid Analgesic Stewardship Program Discussion Paper. The RANZCP is well placed to provide advice on this issue given our expertise in alcohol and other drug use disorders and the potential harms of prescription opioids.

The RANZCP is responsible for training, educating and representing psychiatrists in Australia and New Zealand. The RANZCP has more than 6900 members, including more than 5100 fully qualified psychiatrists. In developing this submission, the RANZCP consulted with members, including the Faculty of Addiction Psychiatry, Faculty of Consultation-Liaison Psychiatry and Faculty of Adult Psychiatry.

The RANZCP welcomes measures to limit inappropriate prescribing of strong opioids, and supports the efforts of the Australian Commission on Safety and Quality in Health Care (‘Commission’) in its establishment of an Opioid Analgesic Stewardship Program. The RANZCP notes that the focus of the discussion paper is as follows:

- Prescribing of opioid analgesics in the emergency department
- Perioperative and surgical services use of opioid analgesics
- Education interventions to improve health professionals’ prescribing competency

The RANZCP has recently endorsed guidelines developed by the Australian and New Zealand College of Anaesthetists (ANZCA) and the Faculty of Pain Medicine: Acute Pain Management: Scientific Evidence 5th edition. [1] This includes clear and evidence-based recommendations on the circumstances in which it is appropriate to prescribe opioids to patients who experience acute pain, including in emergency department and perioperative and surgical settings. Implementation of these guidelines into clinical practice would improve appropriate prescribing of opioid analgesics.

The RANZCP further agrees that there are system challenges to be addressed and encourages measures to address these. This includes filling gaps in access to alternative treatment options for acute and chronic pain as well as improving community understanding of opioid dependence, including the extent of inappropriate prescribing, black market diversions and harm associated with pharmaceutical opioid use. [2]
Gaps in current processes that inhibit achieving positive patient outcomes include insufficient attention given to assessment and management of patients presenting with pre-existing or comorbid substance use/mental health disorders and aberrant behaviours. Furthermore patients on opioid pharmacotherapy or other psychotropic medications such as benzodiazepines, should be routinely assessed and this should inform management.

There is need to streamline approaches to seeing patients with acute pain whom are suspected of seeking opioids because of dependence. Whilst some of these patients are notified to ambulance services and emergency departments, this is largely dependent on individual clinicians and teams. The role for psychiatrists and addiction medicine specialists providing assistance in these situations is important but there is no clear approach as to when assistance is requested. Improved linkages and a multidisciplinary approach with drug and alcohol services is essential in this regard. As implementation of the Real Time Prescription Monitoring (RTPM) system approaches, with the expectation for all states and territories to be integrated into the National Data Exchange (NDE) by mid-2021, it would be helpful for information and training to be provided to medical practitioners about the system, so that it can be used effectively and efficiently.

The RANZCP hopes that this information is helpful in informing the Commission’s development of a stewardship framework for national implementation, followed by a clinical care standard for opioid analgesic stewardship.

To discuss any of the issues raised in this letter, please contact Rosie Forster, Executive Manager, Practice, Policy and Partnerships Department via rosie.forster@ranzcp.org or by phone on (03) 9601 4943.

Yours sincerely

Associate Professor Vinay Lakra  
President

Ref: 2283

References