

# Review of the Drugs, Poisons and Controlled Substances Regulations 2006 – APNA submission

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**29 MAY 2015**

The Australian Primary Health Care Nurses Association (APNA) thanks the Victorian Government Department of Health & Human Services (DHHS) for the opportunity to provide a submission on its review of the *Drugs, Poisons and Controlled Substances Regulations 2006* (the Regulations).

## APNA Submission

As an overall comment on the Regulations, it is APNA's view that some of the information in the Regulations is unclear and/or difficult to locate. This is particularly the case with information relating specifically to nurses (and others) working in general practice or other areas of primary health care. It would be helpful if the revised Regulations could provide improved clarity as well as expanding the explanation of the terminology referred to in the Regulations. It would also be helpful if the online version of the Regulations had interactive links to the documents referred to (for example, supporting legislation).

Specific issues that we would like to raise regarding the current regulations are as follows:

1. The Regulations could expand the Rural and Isolated Practice Endorsed Registered Nurse (RIPERN) program to include nurses working in general practice running nurse-led clinics through the Practice Nurse Incentive Programme (PNIP) for chronic disease management nurse-led clinics. As a supplementary note, APNA would be happy to work with the DHHS and the Commonwealth in looking at a cost benefit analysis for reduced hospital admissions where nurses running chronic disease management clinics have limited prescribing rights in general practice.
2. It would be helpful if the revised Regulations could, as far as possible, be made consistent with other Australian state and territory drugs and poisons legislation; thereby addressing the current disparity between the separate jurisdictions' legislation. At present, the differing drugs and poisons legislation has a negative impact in terms of the work of primary health care practitioners. For example, nurse immunisers have to comply with different sets of regulations depending on their geographic location, despite being regulated under a single national practitioner registration body.

3. The purpose of, and the requirements for, a health services permit is currently unclear in the Regulations. It would be helpful to provide clarity around this. As a supplementary note, the feedback that APNA has received is that the cost of this permit is often prohibitive for general practices.

Finally, APNA understands that the document *'Managing drugs in general practice clinics – Key legislative requirements in Victoria'* (key legislative requirements summary) has been drafted to assist nurses and others in primary health care in understanding and interpreting the Regulations. This document is a valuable resource and has been well received by primary health practitioners. If, as part of its review of the Regulations, the DHHS will also be reviewing the key legislative requirements summary APNA would be happy to provide separate feedback on this document.

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## About APNA

The Australian Primary Health Care Nurses Association (APNA) is the peak professional body for nurses working in primary health care including general practice. APNA provides primary health care nurses with a voice, access to quality continuing professional development, educational resources, support and networking opportunities. APNA strives to increase awareness of the role of the primary health care nurse, and to be a dynamic and vibrant organisation for its members.

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