



**AUSTRALIAN MEDICAL ASSOCIATION
(SOUTH AUSTRALIA) INC.**

ABN 91 028 693 268

14 December 2022

Ms Kerin Montgomerie
Director, Clinical Regulation
SA Health

E: Health.ClinicalRegulationPolicyandLicensing@sa.gov.au

Dear Ms Montgomerie

On behalf of AMA(SA) Council, thank you for releasing for public comment the proposed amendment to the Controlled Substances legislation, relating to requirements for prescribing Schedule 8 medicinal cannabis.

Consultation with members in relevant specialties leads us to support the proposal, which is viewed as a common-sense approach to reducing administration burden. While the reduction of 'red tape' is always helpful, it is particularly so during a period of staff shortages and fatigue.

We agree that ScriptCheckSA can provide effective oversight of cannabis prescriptions, in the same way as it monitors prescribing of opioids and other medications. However, the means of monitoring and analysing the data that is gathered in ScriptCheckSA are not clear; we ask that systems be incorporated to ensure any escalation of prescription numbers or an individual's dosage is identified.

While we recognise the benefits of medicinal cannabis for some patients, we also wish to ensure that wider community exposure to cannabis does not lead to adverse community health outcomes such as mental health issues, adverse pregnancy outcomes, and road trauma. While the legislative reform maintains and is seen to maintain necessary 'checks and balances', we agree that a cautious approach is necessary while there is the possibility of 'problem prescribing' of substances that if not prescribed correctly may contribute to issues of abuse or misuse.

Should you wish us to provide more information or clarify any issue, please contact me via my Executive Assistant, Mrs Claudia Baccanello, on 8361 0109 or at president@amasa.org.au at any time.

Yours sincerely

A handwritten signature in black ink, appearing to be 'M Atchison', written over a horizontal line.

Dr Michelle Atchison

BM, BS, FRANZCP, GDipArtHist

President
Australian Medical Association (SA)

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