



Painaustralia welcomed the opportunity to provide input to the Therapeutic Goods Administration's (TGA) consultation on the proposal to down schedule cannabidiol (CBD). We strongly recommended further education and awareness around the over the counter (OTC) use of CBD and its broader role in effective pain management to ensure that consumers are vigilant to both the benefits and risks posed by these pharmacological therapies.

Overall, we are cautiously supportive of the down scheduling of CBD to a Schedule 3 listing at a maximum dose of 60mg however our preference would be a dosage of 40mg in accordance to new international conventions. Painaustralia would also like to emphasise the need for any change to be undertaken with consideration of the context in which these products are used and the evidence base that supports the use of CBD for chronic pain. It is essential that new pharmacological treatments for pain be accompanied by multidisciplinary treatment access to enable best practice pain management.

While Painaustralia supports current efforts to enable and expedite access to CBD, we remain concerned about the unintended consequences of inappropriate OTC access for a uniquely vulnerable cohort of consumers.

Painaustralia's recommendation to the TGA were:

1. that careful consideration be given to the evidence of potential for OTC CBD to alleviate pain or related symptoms for over 3.7 million people living with chronic pain.
2. that the TGA consider increased pharmacovigilance to support the Schedule 3 listing of CBD.
3. that the TGA consider the broader health and mental health implications of enabling access to CBD
4. that the TGA consider the out of pocket cost implications of enabling OTC access to CBD.
5. that the TGA consider the models that enhance clinical oversight of the use of OTC CBD for pain management.
6. that OTC access to CBD be accompanied by a targeted education and awareness campaign around quality use of CBD and other medicinal cannabis products, drug interactions as well as an evaluation of the change.
7. that the TGA carefully regulate the availability of plant derived CBD products versus synthetic CBD products.
8. that the TGA consider the broader policy impact of enabling OTC access to CBD.