



ANZCA
FPM

14 July 2026

Pharmacy Board of Australia
Via email: PharmBAFeedback@ahpra.gov.au

Dear Pharmacy Board,

Pharmacy Board of Australia public consultation – Endorsement for scheduled medicines for pharmacists – ANZCA feedback

The Australian and New Zealand College of Anaesthetists (ANZCA) acknowledges that the consultation closed on 15 June 2026 and regrets that we were unable to provide feedback within the prescribed timeframe. This was due to the need to consider a number of concurrent consultations of significant relevance to our professions – anaesthesia, pain medicine and perioperative medicine. Notwithstanding the late submission, we believe it is important to outline our concerns regarding the consultation.

ANZCA, which comprises the Faculty of Pain Medicine (FPM) acknowledge the intent of the proposal to improve consistency of pharmacist prescribing qualifications across jurisdictions. However, we have significant concerns regarding the implications for patient safety, particularly the proposed inclusion of Schedule 8 medicines within the scope of the endorsement (Option B), should jurisdictions choose to authorise this practice in future.

From the perspective of anaesthesia and pain medicine, the management of patients with acute, persistent and chronic pain often involves complex diagnostic assessment, consideration of biopsychosocial factors, risk stratification, identification of co-morbidities, multidisciplinary care coordination, and ongoing monitoring of treatment effectiveness and harms. As you would appreciate, many Schedule 8 medicines carry substantial risks of dependence, misuse, overdose, adverse events and medication-related harm. The assessment and management of these patients require clinical judgement developed through extensive medical training and supervised practice that extends well beyond prescribing competency alone. The consultation itself acknowledges that Schedule 8 medicines carry additional risks to patients and require additional safeguards. ANZCA and FPM are therefore concerned that the proposed endorsement may create an impression that completion of a prescribing qualification is equivalent to the broader clinical expertise required to assess, diagnose and manage complex pain conditions safely. Indeed, in some instances Schedule 8 drugs may not be appropriate at all. We do not support pharmacist prescribing of Schedule 8 medicines in community retail pharmacy settings and consider there to be substantial patient safety risks if prescribing authority expands beyond limited, protocol-driven or collaborative care arrangements.

We are also concerned about fragmentation of care and the inherent conflict of interest created where prescribing and dispensing occur within the same commercial environment. This is not permitted for doctors, so it is difficult to understand how pharmacists avoid similar issues. While the draft guidelines seek to address these issues, we remain unconvinced that the proposed safeguards are sufficient to mitigate the risks for patients with complex pain presentations. Accordingly, ANZCA and FPM support limiting any endorsement to Schedule 2, 3 and, where appropriately authorised, specific Schedule 4 medicines. We do not support inclusion of Schedule 8 medicines within the scope of the endorsement.

Thank you once again for considering our feedback. We would welcome further engagement on matters relating to pain management, opioid stewardship and patient safety.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Beavis', with a long horizontal flourish extending to the right.

Dr Vanessa Beavis

Executive Director, Professional Affairs

Australian and New Zealand College of Anaesthetists (ANZCA)