

Key questions for the proposal on tramadol and temazepam:

a. In light of the risks of diversion and harms from misuse identified in the ACMD advice which option do you support?

Please tick only one box

Option 1	Do nothing	
Option 2a	Full Schedule 3 status for tramadol under the 2001 Regulations (including application of safe custody requirements) and removal of exemptions for temazepam prescriptions	
Option 2b	Schedule 3 status for tramadol under the 2001 Regulations (but exclude application of safe custody requirements) and removal of exemptions for temazepam prescriptions.	
Option 3	Schedule 3 status for tramadol under the 2001 Regulations, but with exemptions from prescribing requirements, similar to temazepam, and safe custody provisions (no changes for temazepam)	X
Option 4	Schedule 4 Part 1 status for tramadol (no changes for temazepam)	

Please explain why (maximum 100 words)

- Tramadol is important as an intermediate strength opioid
- Ease of access is important to enable appropriate prescriptions
- Beneficial to patients to avoid progression to stronger opioids therefore reducing risk of drug misuse etc.
- Full prescription requirements will impose an unreasonable burden on an important minority of prescribers for whom electronic prescribing is unavailable
- No objection to safe custody requirements
- No convincing evidence that this burden is justified by potential public health benefits
- Impact of controlled prescribing requirements is less concerning for temazepam. Appropriate prescribing is likely in a primary care setting (electronic prescribing is usually available).

b. Do you agree with the impact assessment of option 2?

Please tick one box: Yes No X Don't know

If no, please explain why (maximum 100 words)

In Section F – Risks (option 2) – statement 1 is probably incorrect. BPS considers that there will be a reduction in the numbers of appropriate prescriptions for tramadol as a result of the change in legal status. This may have negative consequences for patients whose pain control is inadequate with weaker opioids – leaving them with uncontrolled pain or prescriptions for stronger opioids. The assessment of risk is therefore medium or high, rather than low.

- c. Are you aware of any other impact on healthcare professionals, institutions or industry as a result of this proposal, for example additional costs from specific forms used for private prescribing?**

Please tick one box: Yes No Don't know X

Please provide details (maximum 100 words)

N/A

- d. To help inform the full impact assessment please quantify either the:**
- **Additional cash cost per month of this proposal to you or your organisations, or**
 - **The savings per month of this proposal to you or your organisation**

N/A

- e. Do you agree that healthcare organisations or businesses will be able to accommodate tramadol in current storage space?**

Please tick one box: Yes X No Don't know

If no, please explain why (maximum 100 words)

- f. Do you agree with the impact assessment of option 3?**

Please tick one box: Yes X No Don't know

- g. Are you aware of any other impact on healthcare professionals, institutions or industry as a result of the proposal?**

Please tick one box: Yes No X Don't know

- h. To help inform the full impact assessment please quantify either the:**
- **Additional cash cost per month of this proposal to you or your organisations, or**
 - **The savings per month of this proposal to you or your organisation**

N/A

- i. Do you agree with the impact assessment of option 4?**

Please tick one box: Yes No X Don't know

- j. Are you aware of any other impact on healthcare professionals, institutions or industry as a result of the proposal?**

Please tick one box: Yes No X Don't know

- k. To help inform the full impact assessment please quantify either the:**
- **Additional cash cost per month of this proposal to you or your organisations, or**
 - **The savings per month of this proposal to you or your organisation**

N/A