

25 January 2022

The Scheduling Delegate
Therapeutic Goods Administration
Department of Health
Australian Government

Via TGA [consultation hub](#)

Dear Sir/Madam

Proposed Amendments to the Poisons Standard - meloxicam and lidocaine

This submission relates to the proposed amendments to the scheduling of meloxicam and lidocaine.

As Australia's leading animal welfare organisation, we know that the general public has increasing concerns about and less tolerance of animal husbandry procedures that cause pain, suffering and distress.

Each year, millions of farm animals in Australia are subjected to painful procedures, including tail docking, castration, disbudding, dehorning, and mulesing. Often, these procedures are performed without anaesthesia or analgesia. Where effective pain alleviating technologies are available to Australian producers, we strongly urge their adoption.

The RSPCA's position is that where any husbandry procedure that may cause pain to the animal must be undertaken, it is conducted at the earliest possible age using appropriate pain-relieving products and/or anaesthetics. At present, best practice for painful husbandry procedures involves the use of a combination of pain-relieving products, e.g., the use of lidocaine (present in NumNuts® and Tri-Solfen®) in combination with a non-steroidal anti-inflammatory drug (NSAID) such as meloxicam. The combined use of these products offers significant welfare benefits compared to using them singly or not at all.

Meloxicam: RSPCA Australia supports the rescheduling from S4 to S6 for meloxicam in oral transmucosal preparations (e.g., Buccalgesic OTM®) as described in the scheduling requirement. It should be made clear that the rescheduling of meloxicam applies to use in farm animals only.

Lidocaine: RSPCA Australia does not support the proposal to reverse the TGA decision made in October 2021 to reschedule lidocaine from S4 to S5 for injectable formulations used in a rubber ring applicator (e.g., NumNuts®) for tail docking and castration of lambs. If the product is used in the manner intended and described on the product label, we understand there is negligible risk to human health and safety.

The rescheduling of meloxicam (e.g. Buccalgesic OTM®) and lidocaine (in tamper-proof injectable cartridge) will allow greater uptake of pain relief products by producers across Australia, providing welfare improvements for farm animals subjected to painful husbandry procedures.

We look forward to being informed of the outcome of this consultation.

Kind regards

Melina Tensen
Senior Scientific Officer (Farm Animals)
RSPCA Australia

RSPCA Australia Inc.
ABN 99 668 654 249

P 02 6282 8300
F 02 6282 8311
E rspca@rspca.org.au
W rspca.org.au

PO Box 265
Deakin West ACT 2600

