

Medicines and Poisons (Medicines) Amendment Regulation 2025

Queensland Health

Via email to legislationconsultation@health.qld.gov.au

Submission by the **Australian Physiotherapy Association**

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Authorised by:

Rob LoPresti
Chief Executive Officer
Australian Physiotherapy Association
Level 1, 1175 Toorak Rd Camberwell VIC 3124
Phone: (03) 9092 0888
Fax: (03) 9092 0899
www.australian.physio



Acknowledgement of Traditional Owners

The APA acknowledges the Traditional Custodians
of Country throughout Australia and their
connections to land, sea and community.
We pay our respect to their Elders past and present
and extend that respect to all Aboriginal and
Torres Strait Islander Peoples today.

About the Australian Physiotherapy Association

The Australian Physiotherapy Association's (APA) vision is that all Australians will have access to quality physiotherapy, when and where required, to optimise health and wellbeing, and that the community recognises the benefit of choosing physiotherapy. The APA is the peak body representing the interests of Australian physiotherapists and their patients. It is a national organisation with state and territory branches and specialty subgroups.

The APA represents more than 33,000 members. The APA corporate structure is one of a company limited by guarantee. The APA is governed by a Board of Directors elected by representatives of all stakeholder groups within the Association.

We are committed to professional excellence and career success for our members, which translates into better patient outcomes and improved health conditions for all Australians. Through our National Groups we offer advanced training and collegial support from physiotherapists working in similar areas.

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Introduction

The Australian Physiotherapy Association (APA) is pleased to provide feedback to the *Medicines and Poisons (Medicines) Amendment Regulation 2025*. The Queensland Government is at the forefront of healthcare reform with the reforms outlined in this consultation demonstrating the policy leadership required to ensure a robust healthcare system both now and into the future.

APA Position

It is the APA's understanding that the proposed amendments are to align legislation with evolving healthcare provision in Queensland. The APA supports a health system where healthcare professionals are able to work to the top of their scope of practice and, as such, supports most of the proposed amendments in principle. However, we will leave specific comments to the professions directly affected by these amendments.

For physiotherapy, this includes the amendment to the Extended Practice Authorities, allowing physiotherapists to prescribe and administer medicines in urgent care facilities in addition to hospital emergency departments (ED), which the APA fully supports.

The inclusion of first contact physiotherapists in urgent care clinics and minor injury and illness facilities is key to ensuring continuity of care across the primary and acute care interface. First contact physiotherapy in these settings can alleviate the burden of general practitioners by diverting non-life threatening emergencies and maintaining ED for the provision of emergency care.

A significant proportion of the patient load of these facilities is likely to be musculoskeletal injuries such as sprains, strains and spinal pain – conditions currently managed by first contact emergency physiotherapy practitioners in ED. For these services to be successful in diverting non-emergency care away from ED, those employed in these settings need to be able to work to the same scope as in ED which includes physiotherapy prescribing.

Advanced Practice Physiotherapy

Advanced practice (AP) physiotherapy is an established part of the Australian healthcare landscape. Through post-registration competence assessment and/or credentialing, AP physiotherapists are able to demonstrate highly developed clinical knowledge and skills. The skills and knowledge of AP physiotherapists are underpinned by a postgraduate master's level award or equivalent education and training.

Working within the legal parameters of their jurisdiction with appropriate local authorisation, AP physiotherapists work with a scope that may fall within or outside the traditionally accepted scope of physiotherapy practice. This allows them to take responsibility for assessment, diagnosis and management planning for patients who may present with complex, undifferentiated or undiagnosed conditions, undertaking work that has historically been performed by other health or medical professionals.

Advanced practice physiotherapists have been shown to accurately diagnose, appropriately triage and improve treatment outcomes and access to care thus alleviating pressures on our hospital systems while delivering safe, effective and highly cost-effective patient care¹.

¹ Vedanayagam M, Buzak M, Reid D, Saywell N. Advanced practice physiotherapists are effective in the management of musculoskeletal disorders: a systematic review of systematic reviews. *Physiotherapy*. 2021;113:116-130

Results from the APA Advanced Practice Survey (July 2023)

Physiotherapy roles require high levels of clinical expertise



Physiotherapy Prescribing

Prescribing by appropriately trained physiotherapists in ED is well established in Queensland and has been found to be safe and effective in the management of non-complex neuromuscular injuries. As the role of physiotherapy expands within the healthcare system, there is scope for physiotherapy prescribing to extend beyond public health settings. The APA supports ongoing review of State and Territory drugs and poisons legislation with appropriate amendments to allow physiotherapists to prescribe within their scope of practice. We would welcome the opportunity to work with the Queensland Government to support such changes when opportunities arise.