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Packaging, Storage and Disposal Options to Enhance Opioid Safety

Comments from the American Academy of Pain Medicine

Docket No. FDA-2017-N-5897

The American Academy of Pain Medicine (AAPM) is pleased to provide the following comments to the Food and Drug Administration (FDA) for consideration on **Packaging, Storage, and Disposal Options To Enhance Opioid Safety— Exploring the Path Forward:**

- AAPM is pleased that the FDA is addressing this area, which could be an important part of a multifaceted approach to reducing the epidemic of opioid-related harms.
- Packaging has good potential for increasing safety by reducing inadvertent exposure to children, as has been shown by “child-proof” caps on medication bottles.
- It is unlikely that affordable packaging solutions would deter a determined abuser.
- Facilitating disposal of unused opioids holds some promise, but patients are often reluctant to dispose of opioids, because of the possibility of future need and absence of quick availability.
- Costs of any new strategies have the potential to render them underutilized, so long as there are cheaper options. Thus, for some strategies to be useful, there could be a need for universal requirements.
- It is essential that any technology take into account the limitations of people with pain, e.g. pain-related limitations in function due to arthritis.
- Locked automatic dispensers may have promise, especially for patients with limited self-control or memory impairment, but pose challenges for pharmacies.
- We agree that devising ways of assessing the effectiveness of packaging/disposal technologies should be accomplished prior to expending the resources required to develop them.

- Meeting the goal of opioid safety will require investment in broad public education efforts and specific education at point of prescription and follow-up.

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About AAPM

The American Academy of Pain Medicine is the premier medical association for pain physicians and their treatment teams with some 2,000 members. Now in its 34th year of service, the Academy's mission is to optimize the health of patients in pain and eliminate pain as a major public health problem by advancing the practice and specialty of pain medicine through education, training, advocacy and research.

Information is available on the Academy's website at www.painmed.org.

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