

Telephone: [REDACTED]

Reference: [REDACTED]

National Drugs and Poisons Scheduling Committee
Medicines Scheduling, Therapeutic Goods Administration
PO Box 100
WODEN ACT 2606

Via email: [REDACTED]

Dear National Drugs and Poisons Scheduling Committee

The Queensland Family and Child Commission (QFCC) welcomes the opportunity to make a submission to the National Drugs and Poisons Scheduling Committee in support of rescheduling highly caustic hydroxide agents in the Poisons Standard.

The QFCC was established on 1 July 2014 with a role to promote the safety, wellbeing and best interests of children and young people. Under the *Family and Child Commission Act 2014* (Qld), the QFCC has a statutory responsibility to maintain the Queensland Child Death Register (CDR), which contains information relating to the deaths of all children and young people in Queensland since 1 January 2004, and report annually on trends and risk factors. The QFCC works to prevent child deaths by conducting research, analysing child death data, and making recommendations to improve laws, policies, practices, and services which impact children, families, and the broader community.

Highly caustic products pose significant risk of harm. Sodium and potassium hydroxide, with their extremely high pH levels, can cause severe chemical burns and injuries, particularly when used without proper precautions. These products, currently available for domestic use, present a substantial danger to individuals, especially to children and vulnerable populations, who may accidentally come into contact with them.

The current poisons schedule does not adequately restrict the availability of these hazardous substances. Unrestricted access to these products in domestic environments creates an avoidable risk that can lead to serious injuries, long-term health consequences and death. The lack of regulation around their distribution and use exacerbates this problem.

The Queensland CDR contains information relating to the deaths of four children who died from injuries caused by the ingestion of highly caustic domestic consumer products since 2004. The children were one, two, three and ten years of age at the time of the incident. In the most recent case, a one-year-old, died within days of the injury. The other three children died two to three years post injury, all three in the context of ongoing surgical management of serious

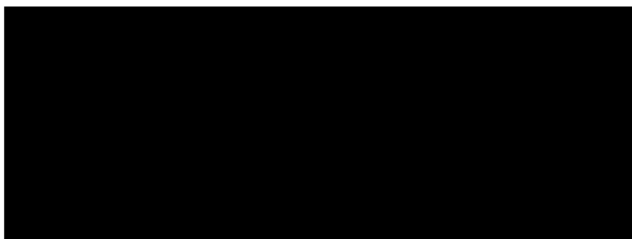
burns. I am also aware of a child in New South Wales who died as a result of caustic burn injury.

Considering these concerns, the proposed change to reschedule sodium and potassium hydroxide products to restrict them to authorised commercial use is a necessary and responsible measure. By implementing this change, we can significantly reduce the risk of accidental exposure and injuries associated with these caustic substances. This restriction would ensure that only trained and authorised persons handle, use and store these products, thereby safeguarding public health and safety.

I commend Dr Ruth Barker and Poison Information Centres nationally, for their proactive approach in addressing this critical issue. Their collaboration in submitting this rescheduling request demonstrates a commitment to protecting the community from the dangers of high pH substances. I support this initiative and urge the National Drugs and Poisons Scheduling Committee to act swiftly in approving this rescheduling request.

If you have any queries in relation to this matter, please don't hesitate to contact me directly on [REDACTED] or via email at [REDACTED].

Yours sincerely



Luke Twyford
Principal Commissioner
Queensland Family and Child Commission

19 February 2025

