

INTERIM REPORT OF CODEINE CONTROL AND OTHER RELATED MATTERS WORKING GROUP (CCRWG)

EXECUTIVE SUMMARY

1. Codeine, an opioid drug similar to morphine, hitherto formulated as tablets and syrups, available as over the counter medicine has been reclassified in 2013 as a controlled medicine. The safety concerns around the use, misuse and abuse of codeine containing preparations and other related substances are well documented and are assuming a frightening dimension in Nigeria.
2. The Pharmacists Council of Nigeria in a memo to the Honourable Minister of Health dated January 12, 2018, proposed the way forward to address the current challenge of codeine and other related substances abuse. The memorandum recommended the constitution of a Codeine Control and Other Related Matters Working Group (CCRWG) with membership drawn from the Federal Ministry of Health, Regulatory Agencies (Pharmacists Council of Nigeria, PCN; National Agency for Food and Drug Administration and Control, NAFDAC and National Drug Law Enforcement Agency, NDLEA), Development Partners (World Health Organisation, WHO and United Nations Office on Drug and Crime, UNODC), other relevant Government Agency (National Orientation Agency, NOA) and Associations (Pharmaceutical Society of Nigeria, PSN; Association of Community Pharmacists of Nigeria, ACPN; Pharmaceutical Manufacturers Group of Manufacturers Association of Nigeria, PMG-MAN; Association Lady Pharmacists, ALPS; Pharmaceutical Society of Nigeria – Young Pharmacists Group, PSN-YPG; Association of Psychiatrists in Nigeria, APN and National Association of Patent and Proprietary Medicines NAPPMED).
3. The Honourable Minister of Health (HMH) graciously approved the constitution of CCRWG in the interest of public health. The CCRWG was inaugurated by the HMH on January 23, 2018 at the Honourable Minister of Health's Conference room.

The Chairman of the Group is Prof. (Mrs.) Oluwatoyin Odeku, Dean, Faculty of Pharmacy, University of Ibadan.

The Terms of Reference (ToR) of CCRWG are:

- (i) Supply Chain Management of Codeine Preparations and other related substances.
- (ii) Engagement and Monitoring of Dispensing Outlets in the Communities to promote rational use of drugs with the potential for abuse.
- (iii) Public Enlightenment and Advocacy on the dangers of drug abuse and misuse.

- (iv) Continuous Surveillance.
- (v) Any other activity (ies) that may be identified as additional strategy in addition to the ones specified above.

The Honourable Minister of Health mandated the CCRWG to submit an interim report within six (6) weeks).

- 4. The Chairman of the CCRWG during the inaugural meeting constituted four (04) Working Committees as follow:
 - (a) Policy and Supply Chain Management Committee – Chairman, DFDS
 - (b) Public Enlightenment and Advocacy Committee - Chairman, Representative of NOA
 - (c) Withdrawal Management and Rehabilitation Committee – Chairman, Representative of APN
 - (d) Engagement and Monitoring of Outlets Committee – Chairman, Registrar, PCN

A WhatsApp group was created by the Chairman for all Working Committees to enable members make contributions on the various issues relating to their Committees.

5. Reports of Committees/Action Plan

(A) Policy and Supply Chain Management Committee

The Committee's report gave the background of the classification of Codeine by International Narcotics Control Board. The various policies guiding supply and control (current regulations), health and social impacts of abuse of codeine, tramadol and other related substances were highlighted.

In 2013, the Federal Government through the National Agency for Food and Drug Administration and Control (NAFDAC) reclassified codeine and codeine containing preparations from over the counter medicines to prescription only medicines.

Key Recommendations

- 1. Collaboration among regulatory agencies namely NAFDAC, NDLEA, MDCN, NMCN and PCN should be strengthened to ensure effective implementation and enforcement of extant Acts, regulations, policies

and guidelines on control as well as 'increased pharmacovigilance' around codeine, tramadol and other related substances.

2. There is an urgent need for the Federal Ministry of Health to conclude the development and approval of the prescription policy.
3. There should be continuous patient counselling and consumer education on the use of codeine containing cough syrups.
4. Mechanisms for strict enforcement of regulations and guidelines on the manufacture, importation, distribution, prescription, dispensing and sale of codeine containing cough syrup and other controlled medicines should be put in place.
5. Gradual replacement of the codeine in cough syrups with dextromethorphan, which is less addictive, over a period of 3 years.
6. The production and sales of the codeine and codeine containing medications should be restricted to licensed Pharmaceutical Manufacturing Companies and Pharmacies in private and public health institutions, respectively, for effective monitoring and control.

(B) Advocacy/Public Enlightenment Committee

The report gave a background on the current situation, actions taken, identified key stakeholders, and their roles and target population.

Key Recommendations

1. The Federal Government through the CCRWG should partner with Nigerian Football Federation (NFF) and Football celebrities, Actors Guild of Nigeria, Performing Musicians Association of Nigeria (PMAN) and other celebrities to drive National Campaign against Drug Abuse.
2. Ongoing Advocacy by State Governors, first ladies, religious leaders, traditional rulers, top Government functionaries and other stake holders across the country should be encouraged by the CCRWG.
3. Massive Media based public enlightenment campaigns through jingles and documentaries aired on National Television and Radio in English and local languages.
4. Agencies of Government saddled with the responsibility of public enlightenment should share information and plans to avoid duplication of programmes within the same location.

5. The Federal Ministry of Health should strongly recommend the State Ministries of Health to embark on public enlightenment campaign in this regard.
6. The Department of Food and Drugs through the Pharmaceutical Services division to produce a memo informing the National Council on Health on the activities of the CCRWG.
7. There is need for massive public enlightenment across the country on the dangers of drug abuse as well as strict monitoring and compliance on the advertisement of codeine containing products based on the reclassification.
8. There should be increased budgetary allocation to the Food and Drugs Services Department of the Federal Ministry of Health and its relevant agencies, for the committee to adequately carry out her programme.

(C) Withdrawal Management and Rehabilitation Committee

The Committee defined codeine and tramadol dependence and highlighted features associated with withdrawal from their use. These features should be inputted into the training materials for Pharmacists and other relevant health professionals and serve as a guide for management and referrals.

The report also captured options for the general and symptomatic management of withdrawal and strategies to promote abstinence after withdrawal.

Currently, there are 11 model drug treatment centres spread across the six geopolitical zones of the country including FCT, and five (5) CSOs that have been upgraded to Drop-in-Centres to care for people with Substance Use Disorder.

RECOMMENDATIONS

1. A comprehensive protocol for the assessment, treatment and referral of codeine, tramadol and other related substances dependence should be developed and included in the training curriculum for relevant health care professionals.
2. On-going efforts to develop the capacity of treatment centres across the country to manage Substance Use Disorders should be supported.
3. Every State in the Federation should have a drug treatment and rehabilitation centre that meets the National minimum standards.

4. Drug treatment intervention should be done across the spectrum of the nation's health care delivery system.
5. Strategies for the use of Opioid Substitute Treatment (OST) in management of codeine and tramadol dependence should be piloted and deployed.
6. Referral networks should be strengthened and scaled up as soon as the pilot scheme is completed.
7. Civil Society Organisations (CSOs) should be strengthened to deliver effective sensitization, prevention, treatment and rehabilitation services.
8. There should be a law to decriminalize users so that they can be free to access health care while retaining the criminal status of illicit producers, traffickers and distributors of controlled substances.

(D) Engagement and Monitoring of Dispensing Outlets Committee

The report highlighted issues contributing to the abuse of codeine and other related substances principal among which are the uncoordinated drug distribution system (existence of open drug markets), presence of illegal (unregistered premises) and non-compliance to regulations. The legal instruments available to enforce proper record keeping, dispensing and disposal of drugs and poisons were also highlighted.

Key Recommendations

1. Development of Information, Education and Communication (IEC) materials on drug abuse (posters, flyers, leaflets, messages, etc) as means of promoting desired, positive behaviour in the community as well as public health approach aimed at changing or reinforcing health related behaviour in relation to codeine, tramadol and other related substance of abuse.
2. Strengthen training programmes, pre- and in-service training, for healthcare providers.
3. Implementation of inventory/tracking system for drug products from manufacturers/importers to end-users by regulatory agencies during enforcement, inspection and monitoring activities.
4. Sensitization workshops for manufacturers and importers of pharmaceutical products on challenges of codeine, tramadol and other related substance of abuse among youths.
5. Fast-track full implementation of the National Drug Distribution Guidelines

6. Effective engagement of stakeholders in the distribution chain to support the fight against drug abuse.
7. Strengthen the process of issuance of import permit for raw materials and finished products of codeine, tramadol and other related substances of abuse.
8. Strengthen and support the Federal Task Force on fake and counterfeit drugs through adequate budgetary provision in order to dislodge the informal channel of distribution.