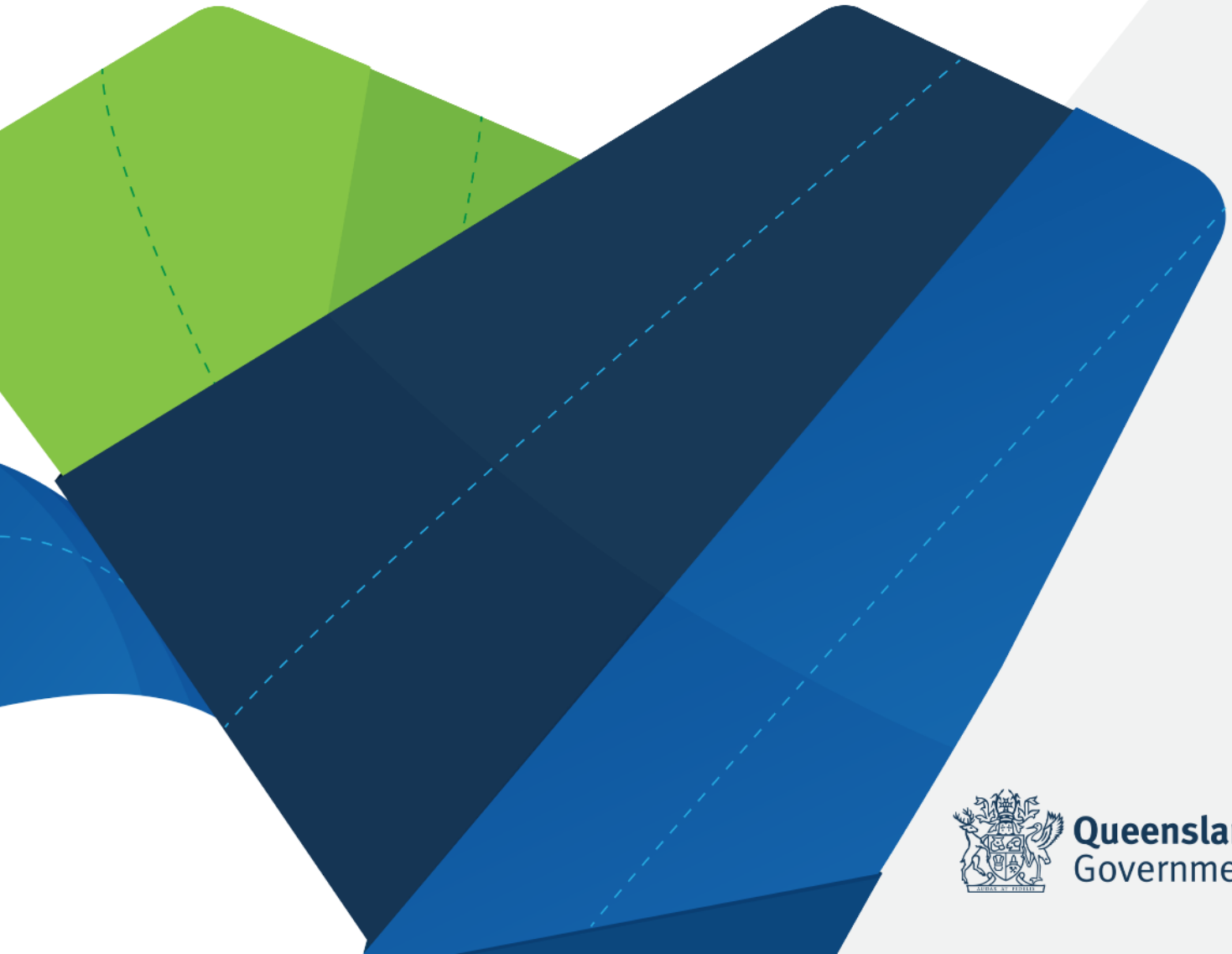
Queensland Health

Review of the Departmental Standard: Secure storage of S8 medicines

Consultation paper

March 2026



Queensland Government

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Introduction

The Departmental Standard – Secure Storage of S8 medicines (Storage Standard) describes the requirements for safe and secure storage of schedule 8 (S8) medicines in Queensland. The Storage Standard was developed with the intention of creating a relevant and practical framework that is outcomes-focussed and flexible in its application.

Since its implementation, matters have been raised with Queensland Health regarding the Storage Standard requirements in certain practice contexts.

In April 2025, Queensland Health undertook preliminary consultation with a wide range of stakeholders on the application of the current Storage Standard (version 2). The feedback received from the consultation, along with previous matters raised by stakeholders, was considered in developing a revised consultation draft of the Storage Standard.

Queensland Health is now undertaking the next phase of consultation with regards to the Storage Standard, which involves providing stakeholders with the opportunity to compare the proposed changes set out in a prepared consultation draft with the current Storage Standard.

The **consultation draft** of the Storage Standard is available at this link. Details on the proposed changes to the Storage Standard have been further outlined in this consultation paper. The **current** Storage Standard can be accessed at this link.

Please note that the consultation draft of the Storage Standard is **not** government policy and is subject to further review, pending stakeholder consultation and feedback.

Making a submission

Feedback is sought on the consultation draft of the Storage Standard, including its overall format, structure and whether it provides a more flexible approach for the storage of S8 medicines in comparison to the current Storage Standard. Stakeholders are also invited to provide suggestions on areas that may require further consideration.

Please provide any feedback by email to mlp.consultation@health.qld.gov.au by **close of business on 2 April 2026**.

If you have any questions or require further information, please email your queries to the email address above before the closing date and an officer from Queensland Health will contact you.

All submissions made by the deadline will be considered, however Queensland Health may not provide a response to each submission.

Background

The Storage Standard, made under the Medicines and Poisons (Medicines) Regulation 2021 (Medicines Regulation), describes the requirements for safe and secure storage of S8 medicines. The Medicines Regulation mandates that S8 medicines must be stored in a way that complies with the Storage Standard.

S8 medicines have a recognised therapeutic use but also have a higher potential for harm as a result of misuse, abuse and dependence. Given the risks associated with potential diversion and misappropriation, S8 medicines must be stored in a manner that ensures appropriate storage and security arrangements.

The intent of the Storage Standard is to provide flexible requirements for the secure storage of S8 medicines across various practice contexts, while minimising the likelihood of unauthorised access and removal of, or interference with, S8 medicines being stored at the place and subsequent risk that these medicines will be misused, abused or diverted.

Proposed changes to Storage Standard

In general, the proposed changes in the consultation draft of the Storage Standard relate to –

- clarifying supporting information and requirements for S8 safes specified in the Storage Standard, including for strong rooms or storage rooms and walk-in vaults;
- clarifying the application of Storage Standard requirements to dispensed S8 medicines;
- removing the need for electronic storage and supply units (ESSUs) to be approved prior to installation in certain settings; and
- revising the format and structure of the Storage Standard.

A detailed summary of the proposed changes contained in the consultation draft of the Storage Standard has been outlined in the table below.

It is anticipated that the proposed changes in the consultation draft will address matters raised by stakeholders, whilst ensuring the Storage Standard continues to achieve its intended purpose of providing a flexible and outcomes-focussed framework for the safe and secure storage of S8 medicines.

The proposed changes in the consultation draft are subject to further review and consideration, pending stakeholder consultation and feedback.

Table 1. Detailed summary of proposed changes in the consultation draft of the Storage Standard

Proposed change	Details of proposed change and rationale
Revision of format and structure of Storage Standard	Consolidation and reformatting of existing tables to require **ALL** S8 safes to meet the specified outcomes and relevant minimum requirements listed for each type of safe. This ensures consistent application of the Storage Standard across different contexts and settings and enables a layered approach to ensure safe and secure storage of S8 medicines. • The S8 safe types included in the consultation draft have been retained from the current version of the Storage Standard, with the addition of strong rooms and vaults. • The outcomes and most minimum requirements for each S8 safe type have also been retained from the current Storage Standard. Minor revisions have been made to include alternative minimum requirements where necessary to meet the stated outcomes.
Revision of supporting information and definitions	• Revision of the introduction to clarify the scope and application of the Storage Standard, including guidance on factors to consider when determining the appropriate S8 safe for a place. • Removal of reference to the Health (Drugs and Poisons) Regulation 1996 (HDPR) and 'secure place' as it is expected that all safes would be compliant with the current in-force Storage Standard requirements. • Update of terms and definitions in glossary, including a revised definition of 'securely attached to premises' to allow greater flexibility in its interpretation.
Requirements for ESSU approvals	Streamline ESSU requirements by removing the need for prior approvals before installation.
Storage requirements for veterinary surgeons	Enabling veterinary surgeons to store S8 medicines in their vehicles, subject to appropriate storage requirements, when attending to treat animals away from their usual place of practice. Current storage requirements require veterinary surgeons to keep S8 medicines in their personal custody, which may be impractical, particularly for veterinary surgeons who travel long distances or to remote locations.

Application of requirements to dispensed medicines	Revision of the application of Storage Standard requirements to dispensed medicines, other than approved opioids dispensed under the Queensland Opioid Treatment Program kept at a regulated place. Current requirements relating to storage of dispensed S8 medicines in a dose administration aid held at a pharmacy or relevant institution, and dispensed S8 medicines kept at a school or child-care facility for a named child, have been removed in the consultation draft Storage Standard. The substance management plan for these regulated places is expected to detail governance arrangements for dealings with dispensed S8 medicines, including ensuring secure and appropriate storage and appropriate recordkeeping.

Questions

The following questions have been identified for stakeholder feedback and consideration with regards to the consultation draft of the Storage Standard. Stakeholders are also welcome to provide feedback on other matters raised in this consultation paper.

- Does the consultation draft of the Storage Standard provide sufficient clarity to support your understanding of its requirements? If not, what additional information or clarification is needed?
- Does the consultation draft of the Storage Standard achieve the intent of providing flexible requirements for the secure storage of S8 medicines, while minimising the risk of unauthorised access to S8 medicines being stored at a place?
- Does the consultation draft of the Storage Standard enable flexible requirements for the secure storage of S8 medicines, in response to enhancements in new technology, engineering and materials (mechanical properties) used for secure storage systems?
- Are there aspects of the consultation draft Storage Standard that may create challenges or unintended consequences for your specific practice setting?
- In comparison to the current version of the Storage Standard, what elements of the consultation draft Storage Standard work well? Are there any elements of the current version of the Storage Standard that should be retained? If so, please specify.