

TGA, PO Box 100 Woden ACT 2606

19th May 2016

Re: Disassembling of EpiPen® to obtain an extra dose of adrenaline (epinephrine).

To whom it may concern,

It has come to Allergy & Anaphylaxis Australia's (A&AA) attention that some outdoor education first aid providers in Australia are recommending disassembling of the EpiPen® device in circumstances where there is no second EpiPen® for use in an emergency. Our organisation believes that this is a dangerous practice on many levels. Firstly there is the danger that the first aid provider does not closely monitor the patient whilst disassembling the EpiPen®. Secondly disassembling the EpiPen® a sharp knife is needed to cut through the tough plastic. There is a danger that the first aid provider may end up injured as well. Thirdly when cut open the EpiPen® no longer has the needle protected, increasing the risk of needle-stick injury. Fourthly, first aid providers are not qualified to administer an intramuscular injection checking the dosage is correct and it is in fact being administered into the muscle and not a vein. Intravenous adrenaline must be administered following a strictly titrated protocol.

This practice has been demonstrated at a recent Outdoor Education conference (see conference outline below):

http://outdoorsvictoria.org.au/education-outdoors-conference-2016/schedule-education-outdoors-conference-2016/

It has also been promoted on a wilderness first aid website:

http://www.survivefirstaid.com.au/wp-content/uploads/Retrieval-of-Additional-Epinephrine-From-Auto-Injectors.pdf

http://www.survivefirstaid.com.au/retrieval-of-additional-epinephrine-from-auto-injectors-a-follow-up/

A&AA asks that the Therapeutic Goods Administration investigate this practice and publically available advice, and responds to us regarding action taken.

Allergy & Anaphylaxis Australia – Your trusted charity for allergy support

Thank you for your time in progressing public safety.

Yours sincerely,



Maria Said

President Allergy & Anaphylaxis Australia

Cc: Dr Melanie Wong, President Australasian Society of Clinical Immunology and Allergy (ASCIA)