



41st Expert Committee on Drug Dependence  
WHO Secretariat  
Geneva, Switzerland

November 2 2018

Dear Hon. Committee Members,

We, the Worldwide Hospice Palliative Care Alliance, are writing to you in relation to the upcoming review of tramadol by the WHO 41st Expert Committee on Drug Dependence on behalf of our members in over 90 countries around the world.

Tramadol is widely used worldwide as an analgesic for moderate and severe pain due to acute and chronic conditions. In many cases, in particular in resource poor settings and in rural areas, it is the only analgesic that is available for the treatment of severe, excruciating pain.

Tramadol has been extensively reviewed by previous WHO ECDDs several times, and consistently the experts have agreed that the reports of abuse and diversion do not merit international control and recommend that governments adopt national controls in countries where they deem it necessary.

We advocate for the rational use of medicines and support efforts taken to implement the necessary measures to prevent diversion and non-medical use, especially for substances that have abuse potential. However, we also meet thousands of patients who suffer in pain, who in spite of needing access to opioids for legitimate medical reasons, have to face a large number of regulatory and administrative barriers which hinder the availability and access to strong analgesics. For this reason, we congratulate the WHO Secretariat in undertaking a thorough evaluation of the extent of the use of tramadol throughout the world.

Tramadol has an extremely important role in palliative care and pain relief in countries worldwide as demonstrated by the survey undertaken by the International Association for Hospice and Palliative Care (IAHPC). Placing tramadol under international control would limit access to millions of patients to pain treatment, especially in countries where there is limited or no access to strong analgesics. We urge the members of the members of the 41st ECDD to consider the implications that placing such a medication under international control would have on the relief of suffering.

We suggest that the ECDD recommends not placing tramadol under international control and instead allow the Member States keep surveillance and monitoring at the national level based on their particular situation. We endorse the International Association for Hospice and Palliative Care's letter to you on this issue.

Sincerely,

A handwritten signature in black ink that reads 'Stephen Connor'. The signature is written in a cursive, flowing style.

Stephen Connor, Executive Director, Worldwide Hospice Palliative Care Alliance