

15 August 2022

Infection Prevention and Control Expert Group (ICEG)

Via email: ICEG.Secretariat@health.gov.au

RE: GUIDANCE REVIEW REQUEST - ICEG: Hierarchy of Controls for minimising respiratory disease transmission

Dear Infection Prevention and Control Expert Group,

The Thoracic Society of Australia and New Zealand (TSANZ) is grateful for the invitation to provide feedback on the document: *Hierarchy of Controls for minimising respiratory disease transmission in the context of COVID-19*. TSANZ believe this document is important to ensure improved respiratory health outcomes for Australians.

[About the TSANZ](#)

The Thoracic Society of Australia and New Zealand (TSANZ) is a health promotion charity whose mission is to lead, support and enable all health workers and researchers who aim to prevent, cure, and relieve disability caused by lung disease. TSANZ is the only Peak Body in Australia that represents all health professionals working in all fields of respiratory health.

The TSANZ has a membership base of over 1800 individual members from a wide range of health and research disciplines. The TSANZ is a leading provider of evidence-based guidelines for the treatment of respiratory disease in Australia and New Zealand and undertakes a large amount of professional education and training. The TSANZ is also responsible for significant research administration and coordinates an accredited respiratory laboratory program.

As the leaders in lung health, we promote the:

- highest quality and standards of patient care
- development and application of knowledge about respiratory health and disease
- highest quality air standards including a tobacco smoke free society and effective regulation of novel nicotine delivery systems
- collaboration between all national organisations whose objects are to improve the wellbeing of individuals with lung disease and to promote better lung health for the community
- professional and collegiate needs of the Membership

Hierarchy of Controls for minimising respiratory disease transmission in the context of COVID-19

The TSANZ support the removal of the statement: *'Where can safely be applied, plan for alternatives to aerosol generating procedures, including high flow oxygen and continuous/bilevel positive airways pressure (CPAP/BiPAP).'* in the revised version of the document.

Evidence suggests that high flow oxygen does generate some aerosols, however the TSANZ note this effect is minimal; in many clinical cases low flow oxygen is adequate. In a hospital setting, non-venting masks and viral filters are used to minimise aerosol generation from CPAP and BiPAP machines but this would not be safe in a setting where patients were not attended to such as residential aged care or quarantine facilities.

The TSANZ notes that while some aerosol medications are appropriately delivered through alternative means, some difficulty is observed for inhaled antibiotics. Furthermore, these medications usually have a mask with reservoir to reduce exposure to staff and other patients.

This view remains consistent from a clinical management perspective. The situation with COVID-19 has changed and the use of non-invasive ventilation remains important; COVID-19 risk can be mitigated without the need for substitution.

Closing remark

The Thoracic Society looks forward to future consultations with the Department of Health and the ICEG when the time comes to address further respiratory health issues. We hope to work together to ensure excellent respiratory health for all Australians.

Yours sincerely,



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President, Thoracic Society of Australia and New Zealand