

14 October 2024

Manatū Hauora | Ministry of Health
133 Molesworth Street
Thorndon, Wellington 6011

By email to: eddy.sommers@health.govt.nz

Tēnā koe

Re: Prescription supply limits

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to provide feedback on Manatū Hauora's proposal to increase the duration of prescription supply limits from 3 months to 12 months during the initial stages of consultation.

The RANZCP is the principal organisation representing the medical specialty of psychiatry in Aotearoa New Zealand and Australia and is responsible for training, educating, and representing psychiatrists. The RANZCP has over 8400 members, including more than 5900 qualified psychiatrists and is guided on policy matters by a range of expert committees. This submission has been prepared in consultation with Tu Te Akaaka Roa, the New Zealand National Committee, and other Aotearoa New Zealand based Committees.

Tu Te Akaaka Roa acknowledges the current challenges faced by health services in Aotearoa, including ongoing health workforce shortages which limit the access to primary and secondary health services. We support easier and more equitable access to diagnosis and treatment of health and mental health conditions and support Manatū Hauora's commitment to improving access to services, particularly for marginalised groups, for whom prescription renewal may be a barrier for treatment. However, we raise concern about potential adverse impacts of the proposed changes to medication supply limits.

Te Kaunihera Rata o Aotearoa | The Medical Council of New Zealand (MCNZ)'s standard for [Good prescribing practice](#) notes that prescriber should:

- only prescribe medicines or treatment when you have adequately assessed the patient's condition,
- be familiar with the indications, adverse effects, contraindications, major drug interactions, appropriate dosages, monitoring requirements, and effectiveness,
- share information about the prescribing with other health professionals involved in the patient's care to ensure continuity of care and patient safety.

Tu Te Akaaka Roa raises concerns that a change in the duration of prescriptions may limit health practitioners' ability to provide adequate clinical care and oversight in line with the expectations set by the MCNZ and transfer substantial responsibility to tāngata whai ora and whānau, increasing the risk of adverse events.

With any medication, there is a risk of side effects and drug interactions, and clinical monitoring is necessary for high quality and safe health care. Prescription supply limits offer an opportunity for engagement with providers and for whai ora to discuss any changes in the condition, general health or personal circumstances that may impact treatment decisions. For example, changes in the condition or emergence of new health concerns may require a change of dosing or type of medication, or alternative treatment options. Without regulatory check-ins, the onus is placed on whai ora to know when they need to seek further help, and communicate the information with relevant providers, creating a risk of:

- Overprescribing or inappropriate prescribing due to changes in the condition or interaction with new medications,
- nonadherence with the prescription regime
- stockpiling of medication, misuse, polypharmacy toxicity and suicide
- diversion of medication, in cases where whai ora has moved or passed away,

Individuals with limited health literacy, those impacted by trauma or other mental health struggles, or culturally and linguistically diverse individuals may be particularly impacted by these changes. Due to stigma associated with mental illness, tāngata whai ora with emerging or existing mental health conditions may be less likely to seek help and regular contact with health providers is essential to ensure their wellbeing. We note that the Coroners Court has recently highlighted the need to limit access to large amount of medication over the course of ten or more months to mitigate the risk of suicide.

Thank you for the opportunity to provide feedback; we look forward to working with Manatū Hauora in the future. If you have any further questions regarding this letter, please contact the New Zealand National Office - Tu Te Akaaka Roa via nzoffice@ranzcp.org or on +64 (0)4 472 7247.

Ngā manaakitanga



Dr Hiran Thabrew
National Chair, Tu Te Akaaka Roa