

3 August 2015

Chloe Dimock
Tender Analyst
PHARMAC
PO Box 10 254
Wellington 6143

By email: consult@pharmac.govt.nz

Establishment of PHARMAC labelling preferences

Dear Chloe

The New Zealand Medical Association (NZMA) welcomes the opportunity to provide feedback on the above consultation. The NZMA is the medical profession's leading pan-professional body, and includes over 5000 members from all disciplines within medicine as well as medical students. The NZMA aims to provide leadership of the medical profession, and promote professional unity and values, and the health of New Zealanders.

We are strongly supportive of the establishment of naming and labelling preferences for pharmaceuticals. We note that the aims of this initiative include the following: i) reducing preventable harm from medication error; ii) providing guidance and transparency to suppliers; iii) ensuring a consistent approach to the assessment of pharmaceutical labelling; iv) aligning with international best practice.

We congratulate PHARMAC on this initiative and consider the document providing guidance on the naming and labelling of pharmaceuticals to be clear and appropriate. The emphasis on using international non-proprietary names (INNs) is particularly welcome, and we support giving the generic name greater prominence than the trade name on packaging.

With respect to biologicals, we are aware of some claims that proprietary names should be used because of allegedly greater uncertainty as to generic substitution with biosimilars. We strongly disagree with these claims, and consider PHARMAC's guidance to use the generic name followed by the manufacturer (ie, <generic name>—<manufacturer>) to be entirely adequate for these types of medicines. Accordingly, we recommend that PHARMAC not make any exceptions for the naming preferences for biologicals.

We hope that our feedback on this consultation is helpful.

Yours sincerely

A handwritten signature in black ink, appearing to read "Stephen Child". The signature is fluid and cursive, with a large initial "S" and a distinct "C".

Dr Stephen Child
NZMA Chair