

17 September 2015

Hannah Hoang
Office of the Psychoactive Substances Regulatory Authority
Ministry of Health
PO Box 5013
Wellington 6145

By email: hannah_hoang@moh.govt.nz

Proposed classification of tramadol as a class C5 controlled drug under the Misuse of Drugs Act 1975

Dear Hannah

Thank you for inviting the New Zealand Medical Association (NZMA) to provide feedback on the above proposal. The NZMA is New Zealand's largest medical organisation and has a pan professional membership. We have more than 5,500 members who come from all areas of medicine. The NZMA aims to provide leadership of the medical profession, and promote professional unity and values, and the health of New Zealanders.

While tramadol is currently available in New Zealand as a prescription-only medicine, we note that the Expert Advisory Committee on Drugs (EACD) is of the view that it would be most appropriate to schedule tramadol as a class C5 controlled drug. The NZMA is supportive of this proposal. We understand that while the EACD previously considered classifying tramadol as a class C2 controlled drug, the Committee concluded that the risk profile of tramadol was more in line with the benzodiazepine family, rather than other opioid analgesics such as codeine. While we support this proposal, we are interested in knowing the evidence behind the EACD conclusion and request the Ministry to kindly share this with us.

We believe that the proposed reclassification of tramadol from prescription-only medicine to class C5 controlled drug strikes the right balance. Classification as a class C2 controlled drug would necessitate the use of a controlled drug pad each time the medicine was prescribed, a time consuming and burdensome requirement, for little benefit. We consider tramadol to be a generally safe and highly effective medicine for the treatment of moderate to severe pain.

Nevertheless, we are aware of its potential for dependence and misuse. If it is classified as a class C5 controlled drug, doctors are likely to be even more judicious in their prescribing of tramadol and even more alert to drug-seeking behaviour. Pharmacists, too, will have a heightened awareness of the dangers inherent in dispensing tramadol.

We hope that our feedback is helpful. We look forward to learning the outcome of this proposal, as well as to receiving the evidence on which the EACD reached its decision.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stephen Child', with a stylized flourish at the end.

Dr Stephen Child
NZMA Chair