

7 June 2012

Sharon Woollaston
Sector and Services Policy
Ministry of Health
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By email: sharon_woollaston@moh.govt.nz

Dear Sharon

Prescribing rights – Misuse of Drugs Act and medicines regulations

The New Zealand Medical Association (NZMA) thanks you for the opportunity to comment on this proposal.

General

In reading the list of controlled drugs that currently may be prescribed by doctors, nurse practitioners, midwives and dentists, the NZMA has become concerned at the number of highly dangerous drugs that are available for prescription.

As the NZMA noted in its submission to the Health Select Committee on the Medicines Amendment Bill

Medicines are integral to effective, quality and safe healthcare delivery. **They can also be extremely dangerous when used inappropriately. Significant adverse drug effects can lead to serious health complications and even death.** The length and depth of training doctors receive means that they are able to regularly take ultimate responsibility for medical decisions and diagnoses in situations of complexity and uncertainty, drawing on scientific knowledge and principles, clinical experience, and well developed judgement¹. This makes medical practitioners the best possible professional group to prescribe medicines given the requirement for an accurate initial diagnosis and the inherent dangers in doing so.

The drugs listed under the Misuse of Drugs Act 1975 are some of the most dangerous and addictive drugs available. While we agree that nurse practitioners, midwives and dentists should be able to prescribe within their scope of practice it is hard to see how many of the drugs listed in the schedules could be seen to be within their scope. If anything, a perusal of

¹Consensus Statement on the role of the Doctor in New Zealand, NZMJ, 4 November 2011 , Vol 124 No 1345
<http://journal.nzma.org.nz/journal/124-1345/4947/>

the list reinforces to us the need to more strictly regulate who may prescribe these drugs. We would therefore be extremely reluctant to see a widening of prescribing powers in relation to these drugs.

Nurse Practitioners

Having noted the above concerns about the number of highly dangerous drugs that can be prescribed, it is the NZMA's view that there is no need to add any further drugs to the current list that Nurse Practitioners can prescribe.

Midwives

The NZMA agrees that the provision of pethidine is no longer best practice. Instead we consider that midwives should be able to prescribe morphine, fentanyl and remifentanyl in a hospital setting or otherwise under the supervision of a physician. We do not believe midwives should be able to prescribe controlled drugs, as this would suggest that the woman has some major abnormality which warrants consultation with, or transfer of clinical responsibility to, an obstetrician.

Doctors

The NZMA considers that the status quo in regard to doctors should continue.

Dentists

The NZMA considers that dentists should continue to be able to prescribe the currently listed controlled drugs for a period of up to seven days. Given the possible addiction problems with oxycodone, however, we wonder if dentists should be restricted to the prescription of morphine.

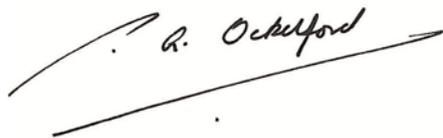
Optometrists

The NZMA does not believe that optometrists need or should be able to prescribe any of the controlled drugs contained in the Misuse of Drugs Act or medicines regulations.

Standing orders

We do not believe any other groups of health practitioners should be able to issue standing orders.

Yours sincerely

A handwritten signature in black ink that reads "Dr. Ockelford". The signature is written in a cursive style and is positioned above a horizontal line that extends across the width of the signature.

Dr Paul Ockelford
NZMA Chair