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By email: eacd@moh.govt.nz

Proposed classification of tramadol as a class C2 controlled drug under the Misuse of Drugs Act 1975

Dear Andrea

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, with more than 5,000 members from all areas of medicine. The NZMA aims to provide leadership of the medical profession, and to promote professional unity and values, and the health of all New Zealanders.

We note that this proposal follows a recommendation by the Expert Advisory Committee on Drugs (EACD) in April 2018 to schedule tramadol as a class C2 controlled drug under the Misuse of Drugs Act 1975. This recommendation took into account various factors, including: i) significant increase in the number of admissions to addiction services for tramadol dependence since a review in 2015; ii) increased recognition that patients can quickly develop tolerance and addiction to tramadol; iii) international trend of scheduling tramadol as a controlled drug.

In addition, it was noted that regulating tramadol as a class C2 controlled drug would improve information collection abilities and surveillance powers over the potential diversion of tramadol for illegitimate purposes. The Committee also believed that reclassifying tramadol as proposed would align it with the current classification of codeine, and help raise prescribers' awareness that tramadol is an addictive opiate that should be prescribed with the same caution as codeine.

We are strongly supportive of the proposal to schedule tramadol as a class C2 controlled drug for all the reasons that have been identified by the EACD. We look forward to learning the outcome of this consultation.

Yours sincerely



Dr Kate Baddock
NZMA Chair