



31 July 2017

Mr Fraser Colson
Regulatory Practice and Analysis
Medsafe
Ministry of Health
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Dear Mr Colson

Re: Proposal to re-classify Fentanyl as a B1 controlled drug, and scheduling of fentanyl precursor substances

Thank you for seeking feedback from the New Zealand Society of Anaesthetists (NZSA) on the above consultation.

About the NZSA

The NZSA is a professional medical education society, which represents over 550 medical anaesthetists in New Zealand. Our members include specialist anaesthetists in public and private practice, and trainee anaesthetists. We facilitate and promote education and advocate on behalf of our members, representing and championing their professional interests and the safety of their patients. As an advocacy organisation, we develop submissions on government policy and legislation, work collaboratively with key stakeholders, and foster networks of anaesthetists nationwide. The NZSA, established in 1948, also has strong global connections, and is a Member Society of the World Federation of Societies of Anaesthesiologists (WFSA).

Response

The NZSA endorses the proposed recommendation that fentanyl be re-classified from a Class B3 to a Class B1 controlled drug, under the Misuse of Drugs Act 1975, and to include the specified precursors of fentanyl in Schedule 4 of the Act.

We consider the change logical and appropriate due to fentanyl's high risk of harm, the significant rise in abuse internationally, and the need to impose tighter controls on the importation and manufacture of fentanyl. Whilst endorsing the recommendation we believe it is mandatory to align the classification of fentanyl with morphine, including the prescribing and supply exemptions under Regulation 22 of the Misuse of Drugs Regulations 1977. It is essential that there is a reliable and ongoing supply of fentanyl to uphold anaesthetic care and patient safety. We support an exemption to the requirement for Ministerial approval before fentanyl can be prescribed, supplied or used, to ensure that there is a constant guaranteed supply. Fentanyl must remain accessible for therapeutic purpose.

The NZSA supports listing the fentanyl precursor substances to enable such bodies as customs to stop the importation of these precursors and the manufacture of fentanyl.



The following link <http://www.emcdda.europa.eu/publications/drug-profiles/fentanyl> includes a table which lists all the Fentanyl derivatives and their UN schedule. These non-therapeutic derivatives, such as Carfentanil, need to be classified along with other narcotics, not with the precursors.

If you would like further information or have any questions please email: president@anaesthesia.nz

Yours sincerely

A handwritten signature in black ink that reads "David Kibblewhite". The signature is written in a cursive style with a horizontal line underlining the name.

David Kibblewhite
President