



1 August 2017

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

*Re: Proposed scheduling of flubromazolam as a Class C1 controlled drug*

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, 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 to schedule flubromazolam higher than a Class C5 controlled drug under the Misuse of Drugs Act 1975. We strongly agree and support the proposal to schedule flubromazolam as a Class 1 controlled drug under the Act. We believe this to be appropriate based on the conclusions of the Expert Advisory Committee on Drugs that flubromazolam has high risks of harm due to its potency, high risk of dependency, misuse and illicit use.

However, we would like to know why flubromazolam is considered riskier than other Benzodiazepines, and is being singled out for a change to its classification.

If you would like further information or have any questions please email:

[president@anaesthesia.nz](mailto:president@anaesthesia.nz)

Yours sincerely

A handwritten signature in black ink that reads "David Kibblewhite".

**David Kibblewhite**  
**President**