



**PHARMACEUTICAL SOCIETY**  
*of New Zealand Incorporated*

9 June 2022

Tangi Utikere  
Chairperson  
Health Select Committee  
Parliament  
Wellington

Dear Tangi,

### **Submission on the Medicines Amendment Bill (No 2)**

Thank you for the invitation and opportunity to provide a written response on the Medicines Amendment Bill (No 2).

The Pharmaceutical Society of New Zealand Inc. (the Society) is the professional association representing over 2,500 pharmacists, from all sectors of pharmacy practice. We provide to pharmacist's professional support and representation, training for continuing professional development, and assistance to enable them to deliver to all New Zealanders the best pharmaceutical practice and professional services in relation to medicines. The Society focuses on the important role pharmacists have in medicines management, the safe and quality use of medicines and supporting access to medicines in both primary and secondary care.

The Society are supportive of the policy intent to provide ongoing population protection against COVID-19 and for the system to respond appropriately, as the pandemic evolves. The draft amendment Bill will also enable the public to maintain trust and confidence in the system and specifically the vaccination administration approach used to date.

The proposed legislative changes ensure the medicine consent or provisional consent are aligned with the intent of the Medicines Act and Medsafes statutory remit (Section 34A(1)). We support this approach.

To ensure the Director-General meets their regulatory requirements under Section 34A(4), advice will be received from officials to help inform recommendations and the legislative notice. To improve transparency and system support, the Society would like to suggest that the Health Committee consider amending this clause to instruct officials to share their advice with health professionals delivering the COVID-19 programme. This change will help with informed consent, any disinformation in the public domain and ensure greater support for people requesting vaccination.

With the imminent revoking of the Epidemic Notice under the Epidemic Preparedness Act a robust futureproofing position is required. However, the draft amendment Bill does not contain any clauses related to evaluating whether there have been any adverse consequences for the market in prescription only medicines or for patient safety as a consequence from implementing the notices. The Society would like to recommend to the Health Committee that a review, report and publish clause is incorporated into the proposed amendment Bill. This would align with other New Zealand legislative instruments and the process used in other jurisdictions who follow the Westminster model. The Society are aware that the legislation will be reviewed when the future Therapeutic Products regimen is enacted. However, this is likely to be two or three years away and therefore we would still recommend the inclusion of the proposed clause.

**THE PROFESSIONAL VOICE OF PHARMACY**

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Due to the short notice period, the Pharmaceutical Society are unable to appear before the Committee to speak to this submission but would be more than happy to provide further input or feedback, where required.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'C. Jay'.

Chris Jay  
**Manager Practice and Policy**