PHARMACEUTICAL SOCIETY
of New Zealand Incorporated

17 October 2023

Medicines Classification Committee Secretary
Medsafe
PO Box 5013
Wellington 6145
via email: committees@moh.govt.nz

Dear Jessica,

MEDICINES CLASSIFICATION COMMITTEE (MCC)
COMMENTS TO THE 71st MEETING AGENDA December 2023

Thank you for the opportunity to submit comments on the agenda for the 71st meeting of the Medicines Classification Committee.

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 pharmacists 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 and in the safe and quality use of medicines.

Regarding the agenda items for the above meeting of the Medicines Classification Committee, the Pharmaceutical Society would like to note the following comments for consideration:

6.1 Phenol – proposed down scheduling to include provision by podiatrists under certain conditions.
The Society supports the concept of podiatrists having access to phenol under certain conditions.

We are aware that currently, due to previous change in classification, phenol has moved from a medical device to a prescription medicine. This has created some challenges for podiatrists when providing care to their patients.

There is sufficient clinical evidence provided by the applicant to support the use of this treatment for nail chemical matrixectomy.

However, there are currently no products on the New Zealand market that have been consented by Medsafe. As a result until a consented product has been obtained, the only way for a podiatrist to access phenol will be through a medical practitioner prescription.

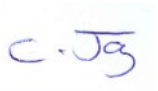
Without a consent product, reclassification will not currently improve access and availability of treatment. This should be addressed at the same time, and we would recommend that any change in classification only occurs if a consented product is available.

The provision of phenol outside a manufacturers packaging creates significant health and safety risks for all involved in handling the product.

We would also like to recommend that perhaps the proposed classification is amended to state: "Prescription except when supplied in a manufacturers original pack by a podiatrist for use in nail ablation" for clarity of purpose.

Thank you for consideration of this submission. I would be happy to discuss any aspect of this further, if required.

Yours sincerely,



Chris Jay
Manager Practice and Policy