

# Submission to the Health Committee on the Medicines Amendment Bill

1. This written submission is made on behalf of the **Nurses Society of New Zealand and Te Uniana o NSNZ Incorporated (“NSNZ”)**. As the second-largest professional body and union for nurses in Aotearoa New Zealand, NSNZ represents and provides services to a significant number of registered nurses across all parts of the health services.

## APPROVAL BY VERIFICATION

2. Prima facie, the proposal to allow approval to distribute a new medicine in Aotearoa New Zealand if the medicine has been approved by two recognised overseas jurisdictions appears to have merit in terms of expediting the availability of new medicines.
3. However, we hold some reservations over whether this is really necessary or best practice. Arguably having our own regulator making its own assessment of the submitted clinical and related data and providing an independent determination is the preferred approach.
4. We note the proposed verification change would require approval by two of the listed overseas regulators. It might be prudent to require approval by more than two regulators – perhaps three or four.
5. Additionally, it would be important to check and ensure that the overseas regulator did not approve the medicine within their jurisdiction by verification.
6. It might also be prudent to limit approval by verification to exceptional circumstances only, such as emergency or short supply situations.

## PRESCRIPTION AND ADMINISTRATION OF MEDICINES

7. The proposed changes designed to enable the wider prescribing of unapproved medicines are supported.
8. The proposed amendment to allow nurse practitioners to prescribe unapproved medicines in the same way as medical practitioners is consistent with nurse prescribing practice in general.
9. Likewise, we support the amendments which would enable all authorised prescribers to prescribe unapproved medicines where there is a funded alternative to an approved medicine that is in short supply.

**NURSES SOCIETY OF NEW ZEALAND *Te Kāhui Tapuhi o Aotearoa & Te Uniana o NSNZ Inc***  
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