



National Council of Women of New Zealand

Te Kaunihera
Wahine O Aotearoa

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Submission to the Government Administration Committee on the Therapeutic Products and Medicines Bill

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing • 38 Nationally Organised Societies (NOS). It has 32 branches throughout the country attended by representatives of those societies and some 150 other organisations and individual members.

The function of NCWNZ is to work for the well-being of women, the family and the community at local, national and international levels through research study, discussion and action.

The Council as the spokesperson for these women's groups has had a long term interest in the development of the new regulatory scheme for therapeutic products and medicines and has written a number of submissions on the topic. Primarily NCWNZ's concern has been with the protection and management of public health and safety risks from a consumer perspective.

Because of time constraints we were unable to consult widely with out membership on this important Therapeutic Products and Medicines Bill. It is unfortunate that the government, while seeking public comment, works to such tight time frames. This could be seen to be compromising the claim to be consulting widely. The way NCWNZ Standing Committees and Branches are dispersed round the country, time needs to be factored in to issuing them with the information, and receiving and collating responses - particularly over December/January when Branches are, like Parliament, in recess.

NCWNZ received some responses from Consumer Affairs and Health Standing Committees and a few other members.

General comments

All respondents agreed that the Bill if passed will provide better health and safety protection and good reliable information for consumers who use therapeutic products.

Members agreed that the five year 50% subsidy for the regulation of costs in the complementary sector would be beneficial for producers. It should continue after the transition period, both financially and through support units.

It was agreed that it is imperative for complementary medicines be monitored and regulated in the interests of public health and safety. This is deemed necessary to prevent interactions with prescription drugs, and to give assurance to consumers about safety and quality.

NCWNZ has recommended in previous submissions that labelling of complementary medicines is of paramount importance for consumers. Such labelling would include full warning of side effects and drug interactions. NCWNZ members remained concerned that party drugs may be produced and marketed as natural substances. Members would fully endorse regulation of these substances to ensure consumer protection and to guard against this.

It was agreed that a joint agency would assist development of the therapeutic products and medicines industry in New -Zealand, including research and development.



Concerns

While recognising concessions and compromises have been made following stakeholder meetings and subsequent presentation of submissions, the following concerns have been expressed by some members:

- That for low-risk products the proposed restrictions coupled with higher administration costs would result in a doubtful benefit to the consumer.
- That generally high compliance costs may result in the withdrawal of some complementary medicines and medical devices in New Zealand and restrict consumer health choices.
- That Maori traditional medicines, subjected to licensing and regulation, might be barred on safety or regulation grounds in an over-prescriptive regime.
- That New Zealand companies, especially the smaller ones, could be disadvantaged under the new scheme with a consequent threat to the availability of their products.

The composition of the Board (clause 189 as defined in Schedule 1 Article 6) has engendered some debate amongst our members. While medical and commercial interests are stated pre-requisites on the Board, the consumer interest is not.

Our members are always concerned when bodies such as the one proposed in this legislation have no provision for the inclusion of consumer input. This should be at every level of the agency, including at governance level. The consumer has tremendous value in bringing a practical commonsense viewpoint to any deliberation and this must not be overlooked. NCWNZ recommends that groups are formed to liaise with the Board with each group having consumer representation. All representatives on such groups should be recompensed for their services.

As defined, the worst case scenario for the Board membership is one New Zealander out of five members. It is acknowledged that Australia has a larger population, but any imbalance needs to be addressed. Suggestions included that the Chairperson should be appointed for a set period and the nationality should change with each appointment; or that Australia and New Zealand each have two members and the fifth is from an independent country.

Thank you for the opportunity to comment on the proposed legislation. NCWNZ looks forward to following the progress of the Therapeutic Products and Medicines Bill and would like to be informed on the outcome of the submission process.

Christine Low
National president

Jan Brown
Consumer Affairs Standing Committee Convener