



**Te Ao Māramatanga  
New Zealand College of Mental Health Nurses (Inc.)  
Partnership, Voice, Excellence in Mental Health Nursing**

8<sup>th</sup> June 2012

Don Gray  
Deputy Director-General  
Policy Business Unit  
Ministry of Health

**Feedback on Prescribing Rights under the Misuse of Drugs Act 1975 and Medicines (Standing Order) Regulations 2002 (March 2012)**

Thank you for the opportunity to provide feedback on the issues raised in the consultation document. Te Ao Māramatanga New Zealand College of Mental Health Nurses (NZCMHN) is the professional body for mental health nurses. We have limited our feedback to the key areas of concern to the College.

Firstly, a key principle should be that prescribing is in accordance with best practice and the needs of the patient rather than constraints of prescribers.

- b) If you consider the existing controlled drug prescribing for nurse prescribers need to be amended please specify:*
- I. The changes you suggest be made to the current prescribing rights*
  - II. The nurse prescribers you consider your proposed changes should apply (i.e. all or some of: nurse practitioners, diabetes nurse specialists, nurses who gain designated prescriber status in the future)*

In order for nurse practitioners with an addiction related scope of practice to practice in accordance with their authorized qualification, it is essential that the Misuse of Drugs Act 1975 is amended. Two important examples are that such nurse practitioners are able to prescribe; 1) opioid medications for opioid withdrawal and for long-term opioid substitution treatment (e.g. methadone and pending buprenorphine (Suboxone)), 2) benzodiazepines, most frequently prescribed in the management of withdrawal e.g. alcohol withdrawal and longer term benzodiazepine withdrawal.

The period of supply should be amended to reflect this change and should be consistent with Medical Practitioner legislation.

**Class A controlled drugs:** It is difficult to comment around nurse prescribing of Class A controlled drugs, but the conditions for nurse practitioner prescribing should be as for Medical Practitioners.



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***Class B controlled drugs:*** Should read as Medical Practitioners “in no case shall the total quantity supplied be greater than a quantity for use for a period of 1 month”.

***Class C controlled drugs:*** Should read as Medical Practitioners “in no case shall the total quantity supplied be greater than a quantity for use for a period of 3 months”.

Yours sincerely

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