



The Royal New Zealand
College of General Practitioners
Te Whare Tohu Rata o Aotearoa

15 October 2025

Ministry of Health | Manatū Hauora
133 Molesworth Street,
Thorndon
WELLINGTON 6011

By email: info@health.govt.nz

Tēnā koe

Proposed amendments to the designated pharmacist prescriber specified prescription medicines list

Thank you for the opportunity to provide a submission on the proposed amendments to the designated pharmacist prescriber medicines list.

About us

The Royal New Zealand College of General Practitioners (the College) is the largest medical college in New Zealand. Our membership of over 5,800 general practitioners and rural hospital doctors comprises 40 percent of New Zealand's specialist medical workforce. The Medical Council of New Zealand accredits the College to deliver vocational training to the specialist General Practitioner and Rural Hospital Doctor workforce. Our Kaupapa aspires to improve equity by upholding principles of Te Tiriti o Waitangi and supporting members to be culturally safe and competent through the General Practice Education Programme, and the Division of Rural Hospital Medicine Training Programme.

Our members provide effective care to their wider community. The safety, quality and effectiveness of care provided by 1000 general practices and 24 rural hospitals is determined by the College's Practice Quality Programme, against the Foundation Standard and achievement of Cornerstone modules.

Te Akoranga a Māui is the College's Māori representative group. With more than 200 members, Te Akoranga a Māui is proud to be the first indigenous representative group established in any Australian or New Zealand medical college.

Our submission

The College supports the proposed amendments to the designated pharmacist prescriber medicines list, provided that existing safeguards remain in place. While the College is broadly supportive, we consider that some aspects of the proposed amendments would benefit from further clarification.

It is important that pharmacist prescribers continue to meet the requirements set out in the Pharmacist Prescriber Competence Standards (Pharmacy Council, 2023) ¹. These standards require prescribers to:

- Assess the person through appropriate history-taking and clinical assessment within a defined scope of practice.
- Consider treatment options and make evidence-informed prescribing decisions.
- Reach a shared decision with the person, ensuring informed choice and partnership that is culturally safe.
- Prescribe responsibly, maintain accurate records, and ensure continuity of care across the health team.
- Provide information, monitor outcomes, and report adverse reactions or errors.
- Practice under clear prescribing governance, including accountability, cultural safety, collaboration, and ongoing audit and peer review.¹

With these safeguards upheld, the College supports the proposed amendments to the designated pharmacist prescriber medicines list.

We ask that the Ministry of Health and Pharmacy Council clarify:

- **The rationale for including medicines that are not yet on the Pharmaceutical Schedule**, noting that while these are registered prescription medicines, they are not currently subsidised.
- **What additional safeguards and monitoring arrangements will apply to medicines such as methoxyflurane**, which require administration by adequately trained personnel beyond the usual pharmacist prescriber scope.
- **How prescribing by hospital-based pharmacist prescribers will be monitored**, and what systems will ensure timely communication with specialist GPs and the wider primary care team so that continuity of care and clinical responsibility are maintained.

Conclusion

The College recognises the valuable role of pharmacist prescribers in improving access to medicines and supporting integrated primary care. We are confident that, with the safeguards already embedded in the Pharmacist Prescriber Competence Standards (Pharmacy Council, 2023), and with further clarification on the issues noted above, the proposed expansion of the medicines list can be implemented safely and effectively.

If you require further clarification, please contact Maureen Gillon, Manager Policy, Advocacy, Insights – Maureen.Gillon@rnzcgp.org.nz.

Nāku noa, nā



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¹ Competence Standards for Aotearoa New Zealand Pharmacist Prescribers, Pharmacy Council, 2023