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

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Ministry of Health | Manatū Hauora
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Tēnā koe

RNZCGP Submission: Purpose, principles and elements of a natural health products regulatory system

The Royal New Zealand College of General Practitioners (the College) thanks the Ministry of Health | Manatū Hauora (Ministry) for the opportunity to make recommendations about the purpose, principles, and elements of a future natural health products regulatory system.

The College is the professional body and postgraduate specialist education college for general practitioners and rural hospital doctors in Aotearoa New Zealand. We represent more than 6,000 specialist GPs and rural hospital doctors, comprising approximately 40 percent of New Zealand's specialist medical workforce. Our motto is Cum Scientia Caritas — with knowledge, compassion.

Our position

The College supports proportionate, risk-based regulation of natural health products to protect patient safety, assure product quality, and ensure therapeutic claims are appropriately scrutinised. Rongoā Māori should be treated distinctly, with regulatory arrangements that are Māori-led and consistent with Te Tiriti o Waitangi and tino rangatiratanga.

Why this matters to general practice

Natural health products are commonly used alongside prescribed medicines and other forms of healthcare. General practitioners and rural hospital doctors support patients to make informed decisions, identify potential interactions and adverse effects, and access appropriate clinical care.

The College's submission focuses on four interconnected considerations.

1. Protecting patient safety and assuring product quality

The College supports proportionate requirements for the safety, quality, and composition of natural health products. Products described as natural should not be assumed to be inherently safe.

Aotearoa New Zealand and international evidence has identified concerns about inaccurate labelling, contamination and adulteration, including toxic elements and substances associated with serious adverse reactions[1,2,3,4]. These risks support appropriate manufacturing standards, product traceability and accurate ingredient disclosure.

Concurrent use with prescribed medicines is particularly relevant to general practice. A New Zealand study (Lee et al., 2023) found that more than half of natural health product users also used prescribed medicines.[1] Potential interactions may be difficult to identify where product composition or ingredients are uncertain. [5,6,7]

2. Supporting informed choice through credible therapeutic claims

The College supports informed consumer choice, underpinned by accurate, accessible and trustworthy information that enables consumers to distinguish substantiated claims from promotional information and understand where evidence is limited or uncertain.

Therapeutic claims should be supported by credible evidence proportionate to their nature and potential risk. Within the commercial regulatory framework, traditional or longstanding use alone should not justify unrestricted therapeutic claims. This does not determine the evidential or regulatory arrangements appropriate to rongoā Māori, which requires a distinct Māori-led approach.

Misleading claims may contribute to delayed diagnosis, inappropriate substitution of treatment, or avoidable harm.[6] The regulatory system should therefore provide appropriate scrutiny of therapeutic claims and advertising.

3. Establishing proportionate and effective regulatory oversight

The College supports a risk-based approach that balances patient safety, consumer choice, and practical implementation. Regulatory requirements should reflect potential harm, considering factors such as product composition, dose, intended use, and therapeutic claims. [8]

Appropriate pre-market requirements should be complemented by effective post-market surveillance.[4,9] Some safety concerns, including adverse effects and interactions, may only become apparent after products enter widespread use.

The College supports clear mechanisms for adverse-event reporting, investigation and timely regulatory intervention, including powers to respond to products presenting significant risks.[10] Reporting requirements should be practicable and, where possible, integrated with existing clinical pathways to avoid unnecessary administrative burden.

The framework should also minimise regulatory gaps between natural health products, foods, and medicines, particularly where therapeutic claims are made. Regulation must be sufficiently robust to protect consumers while remaining proportionate and workable.

4. Giving effect to Te Tiriti o Waitangi and recognising rongoā Māori

The College considers that Te Tiriti o Waitangi must inform the design and implementation of any future natural health products regulatory system. Rongoā Māori should be recognised as a taonga within te ao Māori, distinct from other natural health products. Regulation affecting rongoā Māori should be Māori-led, uphold tino rangatiratanga and protect mātauranga Māori.

The College supports a workable practitioner exemption that enables rongoā Māori practitioners to prepare and provide rongoā within their practice.[10] The regulatory framework should avoid disproportionate requirements on practitioners, protect rongoā and mātauranga Māori, and support equitable access for whānau.

Evidence also highlights the value patients place on rongoā Māori and maintaining Māori cultural values in healthcare.[11] A culturally safe and equitable health system must recognise that people and whānau may draw on different understandings and approaches to health and wellbeing.

Recommendations

The College recommends that the Ministry:

1. Establish proportionate safety and quality requirements, including manufacturing standards, product traceability, accurate labeling and disclosure of ingredients and known interactions.

2. Require credible substantiation of therapeutic claims, proportionate to their nature and potential risk, with appropriate scrutiny of both claims and advertising. Within the commercial regulatory framework, traditional or longstanding use alone should not justify unrestricted therapeutic claims.

3. Ensure consumers and health professionals can access reliable, independent information about ingredients, benefits, limitations, contraindications, interactions and risks, enabling consumers to distinguish substantiated claims from promotional information, supporting medication reconciliation, and reducing the potential for delayed or displaced clinically indicated care.

4. Implement risk-based regulatory oversight that combines appropriate pre-market requirements with effective post-market surveillance, clear mechanisms for adverse event reporting and investigation, and powers to intervene promptly where products present significant risks. Reporting should be integrated with existing clinical pathways where possible to avoid unnecessary administrative burden.

5. Minimise regulatory gaps between natural health products, foods and medicines, particularly where therapeutic claims are made, ensuring regulation is sufficiently robust to protect consumers while remaining proportionate and workable.

6. Ensure Te Tiriti o Waitangi informs the design and implementation of the natural health products regulatory system as a whole, not only arrangements for rongoā Māori.

7. Recognise rongoā Māori as a taonga distinct from other natural health products, with regulatory arrangements that are Māori-led, uphold tino rangatiratanga and protect mātauranga Māori. Detailed arrangements, including a workable practitioner for exemption and support for equitable access for whānau, should be determined by rongoā practitioners and Māori authorities.

Closing

We welcome the opportunity to provide further input as the framework develops.

Nāku noa, nā



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