



ANZCA
FPM

*Te Whare Tohu o
Te Hau Whakaora*

4 May 2026

PHARMAC

By email: Tenderconsult@pharmac.govt.nz

Tēnā koe

Possible brand changes through the annual tender.

Te Whare Tohu o Te Hau Whakaora | The Australian and New Zealand College of Anaesthetists (ANZCA), which includes the Faculty of Pain Medicine (FPM) and Chapter of Perioperative Medicine, thanks you for the opportunity to provide feedback on the above. ANZCA is the professional organisation responsible for postgraduate training programs of anaesthetists and specialist pain medicine physicians, and for setting the standards of clinical practice throughout Australia and Aotearoa New Zealand. The college has consulted with our national committees (National Committee NZ and FPM NZNC) and education and policy advisors in Australia and Aotearoa, whose feedback informs this submission.

Essential medicines

Ephedrine and **Dexmedetomidine** are considered essential medicines by ANZCA. It is particularly critical for these medications that supply is maintained, timely communication of any change in presentation/appearance is communicated by hospital pharmacies to anaesthesia departments, and that careful consideration is given to the key aspects for brand changes identified below.

Anaesthetists are used to having to manage brand name changes. However, issues can arise when changes are not flagged in timely manner; a replacement differs in packaging/appearance from the existing medicine or appears similar to a different medication which it may be confused with; or where the delivery method, formula or concentration has been changed. Warning labels / alert notices may be appropriate in these circumstances.

Written / graphic information is necessary to inform **patients** about changes, especially when moving to a single funded brand. Where there are language barriers, when information and instructions are inadequate or unclear, not culturally safe, or need to be passed on to others (for instance where there are , people are at risk. Appropriately worded, culturally safe information to support patient education should accompany significant brand changes.

Considerations for brand changes

The security of the medicine supply chain ensuring continuity and consistent availability is paramount, but where brand changes need to be made because supply is disrupted or there are opportunities for improvements, the key aspects to ensure safe medication - assuming equivalent efficacy - are:

- Early notification of brand changes to prepare clinicians.
- Clear labelling, given safety margins depend heavily on rapid visual recognition, including:
 - English language
 - clear font with generic name and strength
 - consistency of colours used with a “like for like” substitution.

- Clear listing of any additives or preservatives.
- Same strength and delivery method as earlier supplier/manufacturer.
- Appropriate information to support patient education about changes in appearance, packaging or supplier.
- Reputable manufacturer to provide quality assurance.

Finally, the college takes this opportunity to reiterate its support for environmentally friendly and sustainable pharmaceuticals in building climate resilient and sustainable low carbon health systems, including health supply chains. ANZCA particularly advocates PHARMAC considers the full life cycle of plastic and polymers of concern in its policies for procurement of medicines and devices as per the WHO's call for regulatory action: Greener Pharmaceuticals' Regulatory Highway¹ (2024). Of note is the UNITAID study it cites² illustrating the critical impact of pharmaceuticals on climate, which requires regulatory action on practices that prioritise sustainability and reduce environmental impact throughout the research, manufacturing and supply chain.

Thank you again for the opportunity to provide feedback.

Nāku noa, nā



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Australian and New Zealand
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¹ WHO. Greener Pharmaceuticals' Regulatory Highway. Geneva. WHO; 2024 Dec 20.3p.

Available from: www.who.int/publications/m/item/greener-pharmaceuticals-regulatory-highway

² Unitaid. Report From milligrams to megatons: A climate and nature assessment of ten key health products. Geneva; Unitaid; 2023 Nov. 84p. Available from: https://unitaid.org/upload/Report-From-milligrams-to-megatons_A-climate-and-nature-assessment-of-ten-key-health-products.