

July 31, 2018

Ms Geraldine Hill
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Medsafe
Ministry of Health
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By email: Geraldine_Hill@moh.govt.nz

Dear Geraldine

Codeine – draft alert communication – for review

Thank you for the opportunity to provide feedback on the above consultation. The Australian and New Zealand College of Anaesthetists (ANZCA), which includes the Faculty of Pain Medicine (FPM), is responsible for the training and examination of anaesthetists and pain medicine specialists and for the standards of clinical practice in New Zealand and Australia. ANZCA's mission is to serve the community by fostering safety and high quality patient care in anaesthesia, perioperative medicine and pain medicine.

The New Zealand National Committee (NZNC) of ANZCA has reviewed the proposed changes to age restrictions for codeine in the draft alert communication. The NZNC has also sought advice from experts in the field, particularly paediatric pain experts from the Society for Paediatric Anaesthesia New Zealand and Australia (SPANZA).

In general terms, the NZNC considers the Medicines Adverse Reactions Committee (MARC) contraindication is reasonable. However, we are strongly of the view that the alert should be accompanied by very clear guidance regarding alternatives to codeine. Safety issues relating to the prescription of any opioid or opioid-like drug should be addressed with the alert. It is important that it is emphasised that there is no 'safe' alternative opioid.

There is a large potential hazard to children from them being prescribed an alternative, but more potent opioid and opioid-like drugs in the community, for example, oxycodone IR and tramadol. Our expert advice is that issuing this contraindication without accompanying advice regarding alternative opioid prescribing in children will likely increase the overall hazard to children. SPANZA has already published some advice in this area subsequent to the FDA warning:
<https://www.spanza.org.au/resources-links/guidelines/>.

The alert should highlight that changes are being made for codeine due to the issues of CYP2D6 over-metabolism. Care is required with all opioid related analgesic medication in this patient population. Children who are at risk of respiratory events and require opioids should be usually prescribed a reduced dose. They should be

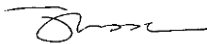
“To serve the community by fostering safety and high quality patient care in anaesthesia, perioperative medicine and pain medicine.”

observed in a monitored environment over the time period for 3-4 doses, prior to discharge home.

Provided that Medsafe address the issues we have raised above, the NZNC is comfortable with the proposed changes to age restrictions for codeine.

If you have any questions or would like to discuss this submission, please contact Mary Harvey (Senior Policy Adviser) in the first instance on 04 495 9780 or at mharvey@anzca.org.nz.

Yours sincerely



Dr Jennifer Woods
Chair, New Zealand National Committee