



19th October 2023

Medicines Classification Committee (MCC) Secretary
Medsafe
New Zealand Medicines and Medical Devices Safety Authority
PO Box 5013
Wellington 6145
New Zealand

Sent via email to: committees@moh.govt.nz

Dear Secretary,

Re: Public Comment on Agenda for the 71st Meeting of The Medicines Classification Committee

Agenda item 8.2.1: Paracetamol

Haleon New Zealand ULC (Haleon) as the supplier of Panadol to the New Zealand market, welcomes the opportunity to comment on the above agenda item, which has been included following the recent decision made in Australia by the Therapeutic Goods Administration (TGA), as announced on 3 May 2023, that there would be scheduling changes for paracetamol, effective date being 1st February 2025.

The aim of that decision in Australia was to implement measures which may help to reduce the amount of paracetamol available within the home, thereby reducing the likelihood of impulsive self-poisoning potentially leading to severe hepatic toxicity.

The changes to the maximum pack sizes in Australia are an appropriately balanced measure that are informed by the treatment protocols detailed in the current guidelines for the management of paracetamol poisoning in Australia and New Zealand ¹.

A reduction of unscheduled paracetamol pack size from 20 to 16 tablets or capsules would provide 2 days' supply, with the total amount of paracetamol per pack remaining below 10 g (which is generally regarded as the minimum toxic dose).¹

¹ Chiew, A. L., Reith, D., Pomerleau, A., Wong, A., Isoardi, K. Z., Soderstrom, J., & Buckley, N. A. (2020). Updated guidelines for the management of paracetamol poisoning in Australia and New Zealand. *Med J Aust*, 212(4), 175-183. [doi:10.5694/mja2.50428](https://doi.org/10.5694/mja2.50428)

Access within a pharmacy environment which has oversight of pharmacists and trained pharmacy assistants, a maximum pack size of 50 x 500 mg tablets/capsules will allow consumers to obtain an amount appropriate to manage mild to moderate pain with a S0s pack providing 6 days' supply. It also takes into account that paracetamol is often a first-line pain treatment in the home, and that households often consist of more than one person who may have requirements for acute pain relief and/or fever reduction, albeit not necessarily at the same time. However the total pack content of paracetamol being reduced from 50 g to 25 g is below the threshold level at which a heightened management protocol for paracetamol overdose comes into effect, which is at ingested doses of 30 g and over.¹

Whilst this MCC agenda item does not appear to be a formal proposal for change, should the MCC be of the opinion that classification changes should be considered, a specific proposal would need to be subject to public consultation for a future meeting (in 2024). Haleon is of the impression, given the wording of the subject MCC agenda item, that no changes to the scheduling of paracetamol are to be made at the upcoming 71st meeting.

Yours faithfully,

A solid black rectangular redaction box covering the signature area.A solid black rectangular redaction box covering the signature area, consisting of two overlapping shapes.