

8 July 2021

PHARMAC

By email: consult@pharmac.govt.nz

Proposal for the supply of primidone and gabapentin

Dear Colleague

The New Zealand Medical Association (NZMA) wishes to provide feedback on the above consultation. We note that PHARMAC is proposing to change the funded brands of primidone tablets and gabapentin capsules as the current supplier of these medicines, Apotex, is leaving the New Zealand market. As replacements, we note that PHARMAC is proposing Teva Pharma's brand of primidone (Primidone-SERB) and Mylan New Zealand's brand of gabapentin (Nupentin). While the consultation acknowledges that a change of brand, particularly of primidone, may be difficult for people, given the withdrawal of the current supplier, we recognise that PHARMAC is faced with limited options.

With respect to changing the funded brand of primidone, we note that Primidone-SERB is not currently Medsafe approved and would initially be supplied under Section 29 of the Medicines Act. We understand that clinical advice from the Neurological Subcommittee of PTAC noted that continued supply of primidone is clinically essential and that supply under Section 29 of the Medicines Act would be preferable to it not being available at all. If this proposal is approved, we also understand that Teva Pharma has committed to seeking Medsafe approval for the Primidone-SERB brand of 250 mg primidone tablets.

While we appreciate the rationale for the above proposal, we have some concerns with the proposed brand switch for primidone. The 2018 Medicines Adverse Reactions Committee report on brand switching identified primidone as a category one medicine in regard to brand switching of anticonvulsants.¹ For this category, doctors are advised to ensure that their patient is maintained on a specific manufacturer's product. Accordingly, before this proposal for primidone is progressed, we ask PHARMAC to consult with Medsafe and make public the advice that is received.

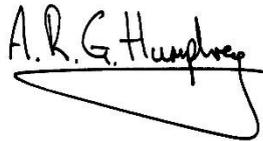
¹ <https://medsafe.govt.nz/committees/MARC/reports/175-Brand%20Switches%20in%20New%20Zealand.pdf>

With respect to changing the brand of funded gabapentin, we note that gabapentin has previously undergone a change in brand. The proposed replacement brand, Nupentin was the funded brand in New Zealand between 2006 and 2018. Accordingly, we are comfortable with this proposal.

To support the proposed brand switching, we note that PHARMAC plans to engage in various implementation activities to assist health care professionals to transition their patients as needed. It is important to ensure that a brand switch is supported by good quality information to patients, prescribers and dispensers.

We hope our feedback is helpful.

Yours sincerely

A handwritten signature in black ink that reads "A. R. G. Humphrey". The signature is written in a cursive style and is underlined with a long, horizontal stroke.

Dr Alistair Humphrey
NZMA Chair