



5th June 2018

Proposed classification of tramadol as a class C2 controlled drug under the Misuse of Drugs Act 1975

FEEDBACK FROM New Zealand College of Midwives
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The New Zealand College of Midwives is the professional organisation for midwifery. Members are employed and self-employed and collectively represent 90% of the practising midwives in this country. There are around 2,900 midwives who hold an Annual Practising Certificate (APC). These midwives provide maternity care to, on average, 60,000 women and babies each year. New Zealand has a unique and efficient maternity service model which centres care around the needs of the woman and her baby.

Midwives undertake a four year equivalent undergraduate degree to become registered. The undergraduate curriculum meets all international regulatory and education standards. Midwives are authorised prescribers in relation to their Scope of Practice as determined by the Midwifery Council.

Midwives provide an accessible and primary health care service for women in the community within a continuity of carer model as Lead Maternity Carers. Midwives can also choose to work within secondary and tertiary maternity facilities, providing essential care to women with complex maternity needs.

The College offers information, education and advice to women, midwives, district health boards, health and social service agencies and the Ministry of Health regarding midwifery and maternity issues. Midwives interface with a multitude of other health professionals and agencies to support women to achieve the optimum outcome for their pregnancies, health and wellbeing.



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Tramadol use in pregnancy and in the postnatal period

The New Zealand College of Midwives (the College) welcomes the opportunity to provide feedback on the 'Proposed classification of tramadol as a class C2 controlled drug under the Misuse of Drugs Act 1975'.

Tramadol is a drug used for the treatment of moderate to severe pain. It has been used commonly in some areas in New Zealand for women after caesarean section or significant perineal repair with good effect as an analgesic.

In response to questions regarding reclassification from regulatory Practice and Analysis, Ministry of Health

The New Zealand College of Midwives notes the reason the Ministry is proposing a change in classification for tramadol is because of a rise in the number of individuals with tramadol dependence. On the basis of this, the New Zealand College of Midwives supports the proposed change of classification of tramadol to a Class C2 controlled drug.

However we note that the only controlled drugs that midwives can prescribe are set out in the Misuse of Drugs Act regulations. Currently these regulations enable midwives to only prescribe pethidine, morphine and fentanyl. The Midwifery Council has further stipulated that these medicines can only be prescribed by midwives for intrapartum care.

Changing the classification of tramadol to a controlled drug will mean that midwives will no longer be able to prescribe it. The College is aware that on occasion, midwives currently prescribe tramadol, for what is likely to be a limited number of post-partum indications. The College would appreciate information about the extent to which midwives are currently prescribing tramadol so we can have a better understanding of the impact of the proposed change on women's access to effective analgesia in the post-partum period.

The New Zealand College of Midwives do not anticipate additional cost to our members associated with the reclassification of tramadol to a Class C2 controlled drug, although it is likely that women may incur additional costs if they need to seek health care from an alternative provider to access effective analgesia if midwives are unable to prescribe it.

Thank you for the opportunity to feedback on this proposed change.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Alison Eddy'.

Alison Eddy

Midwifery Advisor

New Zealand College of Midwives