



Arthritis NZ

Mateponapona
Aotearoa

Submission from Arthritis NZ to Pharmac on the Annual Tender

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1. About Arthritis NZ

Arthritis NZ welcomes the opportunity to comment on Pharmac's Annual Tender.

We do so on behalf of more than 860,000¹ New Zealanders living with arthritis, a diverse group spanning over 100 different conditions, from osteoarthritis and gout to complex inflammatory diseases such as ankylosing spondylitis, psoriatic arthritis, lupus, and scleroderma. For many of these conditions, access to medicines is not a *nice to have*- it is imperative for them to manage their condition.

Our organisation exists to ensure that people affected by arthritis have equitable access to the information, education, and support they need to live well. We provide frontline services through Arthritis Assist, national and online peer groups, community-based programmes, and advocacy that ensures consumer voices are heard in health policy discussions, including those involving Pharmac.

These voices consistently emphasise that certainty, equity, and fairness in medicine funding are key concerns, and these are reflected in this submission.

2. Affected medications

We have identified the following medications from the tender that are used in the management of different forms of arthritis:

- Allopurinol 100mg and 300 mg
- Calcium folinate
- Ibuprofen
- Methotrexate
- Tramadol

3. Submission focus

This submission is consumer focused, reflecting the issues and concerns that consumers have raised with us in consultations. Our consumer consultation included a survey of consumers likely to be affected, consultations with other consumer groups and seeking feedback from LINK our consumer feedback group.

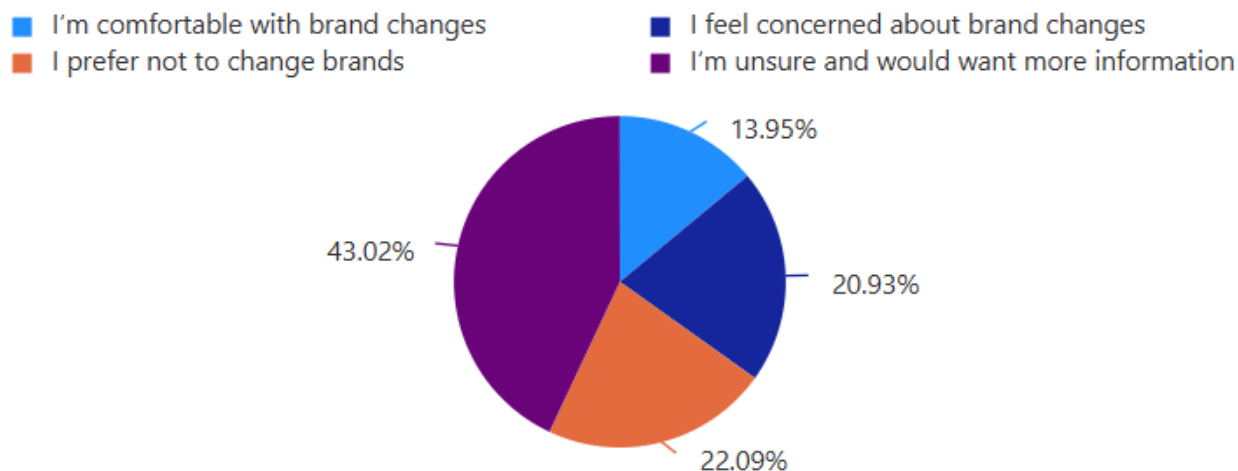
More than 100 people responded to questions about brand changes - the overwhelming majority of whom were using the medications outlined above. Others included family members, health professionals, and individuals involved in our consumer advocacy work.

The majority of respondents used Methotrexate. Ibuprofen and Tramadol were the next most common medications used. Most expressed uncertainty about a potential change of medication

¹ NZ Health Survey, 2024/25

and indicated they would want more information than is provided on the Pharmac website should any change be made.

Consumers were clearly affected by a perception that Pharmac was more influenced by costings than clinical concerns or trust in the selected company. Only 14% of those responding expressed confidence in brand changes.



Key Concerns included (*sample respondent comment in italics*):

- Clarity on whether a brand change means a drug change

“That no changes are made to the ingredients of the medicines, or if so that it is clearly marked on the packaging of any changes and that Pharmacists would explain it to their customers who use/buy those products.”

- Potential side effects

“That the ingredients remain the same. There will be no side effects.”

- Supply consistency

“...my children and I are on several medications that have unreliable supply and this causes unbelievable stress, times with no medication (increased and intolerable symptoms) and more cost due to having to change scripts to get substitute medications (where available). Just today I had to pay another \$25 for a script for my son because his

medication is in and out of stock and they went to a monthly instead of three-monthly script because of supply - it also means an extra trip into town (we are rural)."

- Trust in the manufacturer

"Has the change in supplier have any proven results from research on this medication and have any successful trials been done. I would like to know any new side effect is that I have complicated health."

- Additional concerns were the rationale for change, contingency if the new medication is ineffective, and which countries are already using the new brand. The accessibility of packaging of medications, what aids might be needed to take it and working with Health NZ to fund blister packs.

"That pills I have to take have consistent supply have had issues recently with [other medications] and if something is being discontinued or is unprocurable let the patients know before it is gone so we can organise alternatives we don't take them for fun."

Generally, feedback reflected limited confidence in Pharmac communication around brand changes. Past observation by consumers of the systemic issues and risk of side effects associated with the change in funding of Logem (Lamotrigine), is clearly remembered², and continues to influence consumer perception.

The review of the issues around this brand change also highlights the difficulty patients have in receiving information about notifications and the potential impacts and benefits for consumers.

Positively, communication from Pharmac to patients around the transition from Humira to the biosimilar Amgevita for inflammatory arthritis had been well received and considered a model approach for this round of consultation on possible brand changes.

4 Summary of the open-ended responses

The feedback from the open-ended question indicates that people living with arthritis are concerned about the potential impact of changes in medication brands. While some respondents understand that changing suppliers or brands may have reasons, there is a strong need for

² <https://www.hdc.org.nz/decisions/case-studies-nga-matai-take/medication-brand-changes-highlighting-systemic-issues-with-ongoing-risks-to-consumers/>

reassurance that any replacement medication will be genuinely equivalent in effectiveness, safety, quality, dosage, and long-term availability.

A consistent theme across the responses is that many people have taken years to find a medication routine that keeps their condition stable. For some, medications such as methotrexate, allopurinol and anti-inflammatories are not optional. They are essential to managing pain, mobility, inflammation, daily functioning, and quality of life. Several respondents shared previous negative experiences with brand changes, including reduced effectiveness, new side effects, allergic reactions, issues with fillers or coatings, and difficulty adjusting to new formulations. This has understandably created low trust and anxiety for some consumers.

Respondents also emphasised the importance of clear, transparent communication. People want to know why changes are being made, whether the active and inactive ingredients will remain the same, where medicines are manufactured, whether allergens such as gluten, lactose or dyes are present, and whether there are any known interactions. Supply was another major concern, with people wanting confidence that brand changes will not lead to shortages, extra costs, or disruption to treatment.

The full list of responses to asking for comments on the tender process are in Appendix 1.

5 Conclusions

This consultation underscores the need for comprehensive consumer engagement and thoroughly planned delivery of detailed information about a new brand. General assurances and statements about safety do not foster consumer trust – *trust us because we know best* is not a message that builds consumer trust.

Information provided should be accurate and user-accessible in plain language that addresses issues of trust and clarity. It also needs to be constant rather than a one-off notification on a web site that many consumers do not use.

Arthritis NZ will use this consultation to enhance effective consumer communication, and we welcome collaboration with the External Engagement Team to ensure that meaningful engagement becomes standard practice within Pharmac processes. 

6 Recommendation

Overall, the feedback suggests that any medication brand change must be handled carefully, with strong communication, clear labelling, accessible information, pharmacist and clinician guidance, and meaningful reassurance around safety, effectiveness, and supply. For people living

with arthritis, these medications are central to maintaining stability, independence and wellbeing, so any change must give patient confidence and continuity of care.

Appendix 1. Summary of open-ended responses from our consumer survey

- Will different strengths of tramadol be different brands? How will this affect people moving from one strength to another or taking two strengths? Will Ibuprofen be coated (easier to swallow).
- I take Celebrex and would like to know it will be continued. Ibuprofen was my previous prescription, but I found it hard on my stomach.
- I find it frustrating that given the billions around the world who suffer from arthritis there is very little available to older folks without side effects.
- Typically, when there are brand changes the medication is not as effective as the original medication despite Pharmac providing assurances that the efficacy is the same.
- That no changes are made to the ingredients of the medicines, or if so that it is clearly marked on the packaging of any changes and that Pharmacists would explain it to their customers who use/buy those products.
- That the ingredients remain the same. There will be no side effects.
- There will be no increase in costs.
- Does a brand change mean using a generic? If so, why not just ask if people if they mind using a generic drug. Seems the words aren't quite clear and designed to confuse.
- Any side effects of the medications. And any side effect with drugs interactions with drugs you may be taking. As I was told not to take Azathioprine and Allopurinol it can be fatal.
- My almost 7-year-old daughter uses Methotrexate to survive. She has an autoimmune disease and Methotrexate these past 5 years has ensured she can walk and move her body. Without it or with any significant changes to the medication that she so depends on, she will have severe problems and inflammation leading to deformations with her ankles, knees, finger joints and eyes. She lives her life in constant pain. If you change the medication you will put not only a big burden on her, but also us as a Whanau because we don't sleep when she is in pain, we can't work when we need to take her to hospital, her

sibling suffers and you will be putting strain on the already exhausted medical staff and system. Thank you.

- Why they cannot continue with existing brands - how are contraindications being communicated to clinicians and health consumers.
- That there won't be any new side effects and that it will still work as good as the current medication.
- Any change should have the same efficacy.
- Despite assurances from Pharmac, I have had serious side effects following brand/manufacturer changes of other medications previously. I have no confidence in Pharmac at all.
- That the replacement will still have the same benefits.
- "The current Methotrexate injection is a struggle to open the needle every time. The previous one was better.
- It would be great if you could start prioritizing dye free formulations as well as formulations that doesn't have common inactive ingredients that people react to like gluten and lactose.
- That the results and side effects won't change that it is the same ingredients just in a different package.
- Why it is changing and that residual risks have been adequately reviewed (I.e. the risks with the epilepsy drug change that killed people does not occur again).
- Tramadol is my go to pain relief, I haven't had a reaction to so- Same 'fillers' in the capsule? Same size? Works just the same? Where is it made?
- I have had changes in medications to generic items before from Pharmac and reacted being a sensitive to drugs person. Because I can only just tolerate methotrexate it is a worry to me if it is going to be changed to a cheaper version.
- The drug I take if changed does the same that the drug I have been taking. Any side effects are the same.
- Please don't mess with meds that have made me stable in condition side effects. When my hydroxychloroquine changed, I notice differences and any new allergens.
- Would it be like for like and why the change? Would it do the same job and what are the side effects compared to original?

- If the newly branded medication is exactly the same in terms of dose and what it's supposed to do and the kind of reputation the manufacturer has. I would also like to know if they can guarantee supply won't be compromised with global/political tensions being fraught at the current time. Thank you.
- Has the change in supplier have any proven results from research on this medication and have any successful trials been done. I would like to know any new side effect is that I have complicated health.
- Just that the pill will work the same and that there isn't any more side effects.
- Please do not change these brands. My body reacts poorly when this happens. I am immune compromised and have a very sensitive system.
- My medication works really well for me. It allows me to live a full, productive life. I would like evidence-based decisions that will ensure that any change in medication will not impact this aspect.
- Ensure effectiveness of the medication and consistency with the supply.
- Are these meds generic and where are they manufactured? India has some very serious issues around manufacture.
- Whether any change would still do the same job if not better than current, particularly methotrexate.
- I would like to be sure that the meds are the same ingredient list manufacturer has the highest of standard for testing and quality control as NZers expect.
- That any change to my regular medication (that has taken years to get the right balance of) will not give me side effects, and that there will not be supply issues.
- My main concern is it going to be effective as the current pills. When I change from one brand of pregabalin to another it took weeks for my body to adjust. I can't have this happen with my pain meds.
- I've had some really funky reactions to medications when the brand has changed. I'm really concerned when my medication changes brand. I am MORE concerned about supply - my children and I are on several medications that have unreliable supply and this causes unbelievable stress, times with no medication (increased and intolerable symptoms) and more cost due to having to change scripts to get substitute medications (where available). Just today I had to pay another \$25 for a script for my son because his medication is in and out of stock and they went to a monthly instead of three monthly script because of supply - it also means an extra trip into town (we are rural) as I couldn't

match up the script pick-ups with my daughter that are finally back in stock after nearly 3 months out of stock and unmedicated for the last 2.

- That the injection version will still be available and it won't be substituted for cheaper ingredients.
- Worried about side effects as different brands of pills can have different fillers or colouring which can cause issues.
- How will it react to my immune system with my current brand has had none for 30 years.
- That the replacements are free of allergens such as gluten.
- That the current Methotrexate I take to enable me not to live in constant state of pain with Rheumatoid Disease, will not change.
- That pills I have to take have consistent supply have had issues recently [two medications] and if something is being discontinued or is unprocurable let the patients know before it is gone so we can organise alternatives we don't take them for fun.
- If the replacement has the same effectiveness, and if there are new possible side effects.
- Whether the brand change has any impact on the quality or consistency of the medication. Methotrexate has been a very effective medication for me in managing my RA and the thought of it changing in any significant way worries me. I had quite a journey to finalise my current medication plan which is working brilliantly for me at the moment.
- More transparent information.
- In particular if there is any difference in the substances in the pill which might alter the effectiveness or my body's reaction. The labelling is very important. Recently pharmac changed [two other medications]. I take both these pills and have felt they have a lesser impact on my condition since the brand change. Also the brand name [is] so big all over the foil packet of [] and what it is and ingredients are too tiny to read. It would be very easy to confuse with other medications. I have Fibromyalgia. It would have been nice to have reassurance before the change.
- Why the need to change brands and is the product the same as what I'm taking now.
- That the change of drug won't create new side effects from the original and that has exactly the same efficiency.
- That the drugs they are changing to generic brands have the same ingredients and the same quantity and quality. Any side effects reported from those who have changed already. Are there any supply issues now or in the future.

- That is the SAME medication and supply will not be affected.
- Why the need to change medications for rheumatoid arthritis
- To ensure methotrexate will be unchanged from its current effectiveness and safety
- When my thyroxine changed it was less effective and I'm worried the methotrexate will be the same
- That they are getting the best price so as to save the most taxpayer funding.
- The effectiveness of the drug remains the same
- Equivalence of the medication
- Effectiveness of drug and safety affects
- That there is no difference between the pills as when the Codeine was changed the strength wasn't the same and didn't seem to work the same also the side effects were worse.
- All current policies and regulations are adhered to.
- That my major medications will still be available if there are shortages due to the fuel crisis. I need to be able to trust the brand & that the medications are the same recipe
- That any change would mean the drug is just as effective and works as well for patients and no extra side effects or downside for patients needing these