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18 November 2021

Dr Curtis Walker Chair Medical Council of New Zealand Level 24 AON Centre 1 Willis Street Wellington By email: mcnz@mcnz.org.nz

Dear Dr Curtis Walker

Doctors Importing or prescribing imported ivermectin

I am writing to formally notify my concerns regarding the professional conduct and competence of the Registered Medical Practitioners mentioned in this letter to the Medical Council of New Zealand pursuant to section 34 of the Health Practitioners Competence Assurance Act 2003.

Background

The Medsafe Investigation and Enforcement Team (IET) has had interactions with Registered Medical Practitioners importing ivermectin or authorising the release of ivermectin imported by private individuals. The IET believes that the ivermectin is for treatment for COVID-19. Their belief is based on either direct statement from the importer or based on quantity imported and the increase of ivermectin imports coinciding with the delta variant spreading throughout New Zealand. The medicines imported are not approved in New Zealand. Based on the IETs knowledge and experience the medicines are acquired though e-commerce platforms and/or online pharmacies that appear to be operating outside the legitimate supply chain. This practice raises concerns as to the medicines safety and efficacy. The Doctors listed below have imported consignments, which have been seized. At this has made an application to the District Court to challenge the stage only Dr seizure. 2 Dr

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The Doctors listed below have authorised the release of medicines imported by private individuals. There are other Doctors who initially authorised the release of medicines, but after further communications with the IET, revoked their authorisation. They are not included in the memo.

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In addition to this Dr Alison Goodwin has contacted the IET seeking advice on the process of authorising the release of ivermectin imported by an individual. To date, the IET has not received an authorisation to release the imported medicine.

Rationale

The rationale for this notification is:

- 1. The Doctors are all registered medical practitioners with current annual practicing certificates.
- 2. The issues raised by the IET are significant and serious deviations by the Doctors from the required standards of practice, including
 - a. The Royal New Zealand College of General Practitioner has issued advice that off-label use of ivermectin for treatment of COVID-19 is strongly not recommended. These Doctors are operating outside of that recommendation b. The IET has reasonable grounds to believe that an offence against the Medicines Act 1981 has been committed by the Doctors who imported the medicine. No decision has been made as to what, if any, action will be taken beyond seizure.
 - c. As it is probable that the medicines were purchased from online sources operating outside the legitimate supply chain, it is considered unlikely that the Doctors have made their own enquiry into the safety and efficacy of the medicines, which is a requirement when prescribing unapproved medicines.

d.

Please contact Senior Investigator Nicola Squire to obtain up to date information and if you require further information from her.

Supporting Information

In support of this notification is a memo from the IET about the importations and their interactions with the Doctors.

Yours sincerely
Dr John Crawshaw
Medical Officer of Health

https://www.rnzcgp.org.nz/Covid19/College_support/Ivermectin/Covid19/College_support/Ivermectin.aspx ?hkey=f434bef2-bae9-4d95-9b38-924ba98b5cd0