



Submission to the Ministry of Health

on

Proposed Amendment to Regulations under the Medicines Act 1981

9 January 2015

INTRODUCTION

1. A not for profit incorporated society, Water New Zealand promotes and enables the sustainable management and development of the water environment. With 1500 members Water New Zealand's membership is large and diverse, including Territorial Local Authorities, Council Controlled Organisations, water and wastes services providers, the major consultancies involved in providing engineering, planning and research services to the industry, Crown and other research institutes involved in the water and wastes environment, academia, members of the legal fraternity and training providers.
2. The Association supports the development of regulations under the Medicines Act 1981 that would have the effect of determining that fluoride substances used to treat drinking water are not medicines.

SUBMISSION

3. Water New Zealand has recently been involved with the Ministry of Health in the development of a *Code of Practice – Fluoridation of Drinking Water Supplies in New Zealand*.
4. There is ample scientific evidence that the addition of fluoride is concentrations between 0.7 and 1.0 ppm has significant dental health benefits.
5. Water New Zealand recognises that there is likely to be continued opposition to fluoridation by some sectors of the community. From our perspective it is important decisions made by communities have a sound scientific basis. The most recent attempt to prevent fluoridation by arguing that fluoride is a medicine under the Medicines Act does not appear to have a sound basis in science and undermines efforts being taken by regulatory authorities to improve dental care in New Zealand.
6. Water New Zealand supports the use of regulation making powers under the Medicines Act to specify that the following substances are not medicines for the purposes of the Act:
 - a. Fluorosilicic acid (H_2SiF_6)
 - b. Sodium fluoride (NaF)
 - c. Sodium fluorosilicate (Na_2SiF_6)
7. In our view these compounds should be specifically named in the regulations. We suggest the proposed new regulation to be made under section 105(1)(i) read as follows:

'The substances fluorosilicic acid (H_2SiF_6), sodium fluoride (NaF) and sodium fluorosilicate (Na_2SiF_6) are not medicines for the purposes of the Act when they are used for the purpose of fluoridating community water supplies.'

Sincerely

John Pfahlert

Chief Executive