

11 February 2025

Pharmac  
Level 9 Simpl House  
40 Mercer Street  
Wellington Central  
Wellington 6011

**Submission: Proposal to change the regulatory and funding restrictions for stimulant treatments for ADHD**

The Mental Health Foundation of New Zealand (MHF) supports the submission of ADHD New Zealand on this proposal, including their recommendations for making the prescribing model for ADHD as effective and safe as possible.

As noted in our submission on Pharmac's earlier proposal to remove the renewal criteria for access to stimulant medicines, access to equitable assessment and support for ADHD and other neurodevelopmental disorders is relevant to the MHF's work to promote positive mental wellbeing for all New Zealanders. While ADHD is not a mental health condition, people with ADHD can be at greater risk of experiencing mental and/or suicidal distress than the general population, and the challenges associated with ADHD can negatively impact mental wellbeing, particularly if diagnosis and support are inaccessible, delayed or disrupted, or the condition is misdiagnosed. We strongly support action to improve equitable access to ADHD assessment and treatment, including targeted measures for underserved populations, such as young adults in the justice system (Anns et al., 2023) and tamariki Māori living in rural or high deprivation neighbourhoods (Cargo et al., 2022).

The MHF understands there will be several issues to address in the implementation of this proposal, such as comprehensive training, guidance and support for health practitioners, and measures to support better public understanding of ADHD, addressing both misinformation and stigma as well as quality information for health care users. For these purposes we recommend Pharmac work with, and be guided by, the ADHD community, health entities such as the Royal College of General Practitioners, and advocacy organisations such as ADHD New Zealand.

Thank you for the opportunity to comment on this proposal.

Mauri tū, mauri ora,

## Shaun Robinson

Chief Executive

### References

- Anns, F., D'Souza, S., MacCormick, C., Mirfin-Veitch, B., Clasby, B., Hughes, N., Forster, W., Tuisaula, E., & Bowden, N. (2023). Risk of Criminal Justice System Interactions in Young Adults with Attention-Deficit/Hyperactivity Disorder: Findings From a National Birth Cohort. *Journal of attention disorders*, 27(12), 1332–1342. <https://doi.org/10.1177/10870547231177469>
- Cargo, T., Stevenson, K., Bowden, N., Milne, B., Hetrick, S., & D'Souza, S. (2022). Medication dispensing among Māori and non-Māori screened for preschool ADHD. *The New Zealand medical journal*, 135(1565), 95–103. <https://doi.org/10.26635/6965.5862>