

30 April 2025

Hon Simeon Brown Minister of Health Parliament Buildings Wellington 6011

By email: [S.Brown@ministers.govt.nz](mailto:S.Brown@ministers.govt.nz)

**Re: Health sector concerns with flawed regulatory review process and call for proper consultation**

Tēnā koe Minister

This letter represents the collective voice of 10 health organisations and over 75,000 health professionals. We are writing to express our deep discontent and shared concerns with the *Putting Patients First: Modernising health workforce regulation* consultation.

While we welcome a review of the existing regulatory framework, high value and meaningful consultation hinges on a robust and transparent process. We believe the current consultation process is deeply flawed due to:

- **Absence of a clear problem statement:** The consultation lacks a defined and evidence-based rationale for change.
- **Biased questioning and scenario framing:** The questions and scenarios are leading and suggestive, appearing to funnel submitters toward a pre-determined outcome.
- **Restricted submission format:** The exclusive reliance on a narrowly structured and inaccessible online submission portal limits full and considered participation.
- **Lack of transparency regarding analysis:** The methodology for AI analysis, including the equitable weighting of collective versus individual submissions, remains opaque. Our requests for clarification on this matter have gone unanswered.

These concerns, coupled with the absence of evidence to indicate a regulatory gap, leads us to conclude this a window-dressing consultation. Even the title 'putting patients first' unfairly and wrongly implies this is not already central to regulators' and individual health practitioners' daily practice. We also have significant concerns with the substantive changes being proposed which appear to lower crucial training, regulatory, and clinical standards while introducing an unwarranted level of government intervention. A genuine consultation process would allow a more thorough consideration of these issues and the associated ramifications for patient safety and quality of care. In the absence of such a process, we are compelled to raise these concerns directly with you.

We reiterate our request for your immediate intervention and urge you to initiate a new good faith consultation process that is transparent, evidence based and sufficiently detailed to elicit meaningful

feedback from those with direct experience and knowledge of the realities of the health sector in Aotearoa New Zealand. There is too much at stake not to get this right.