



16 September 2025

To: **Associate Minister of Health Hon Matt Doocey**

Via email: m.doocey@ministers.govt.nz

cc: Minister of Health Hon Simeon Brown (via email) s.brown@ministers.govt.nz

Dear Associate Minister Doocey

We are following up our previous correspondence with your office around the continued prescribing of off-label 'puberty blockers' for young people.

We have sought further legal advice and wished to raise these concerns with you, notably that you and the Government have not yet acted to address the concerns around puberty blocker use on those aged under 18 years of age.

SUMMARY OF REQUESTS

We strongly believe, including after seeking further legal advice, that **the Government must regulate under [section 105 of the Medicines Act](#) to restrict the off-label prescribing of puberty blockers for those under 18 years of age.**

We are also concerned to see that **the Ministry of Health continues to contradict its own [Evidence Brief](#) by continuing to rely on, and refer people too, the PATHA guidelines.**

Finally, after legal review, we believe **the Government is breaching rights and freedoms under the New Zealand Bill of Rights Act (NZBORA) by failing to protect gender dysmorphic children and teenagers against the prescribing of puberty blockers that have no quality evidence of safety, efficacy or reversibility.** This manifests in the failure to regulate under section 105 of the Medicines Act to restrict the prescription of puberty blockers off-label, as some comparable OECD countries have done.

CONTEXT AND OFF-LABEL USE

On 21 November 2024 the Ministry released the Evidence Brief on the Impact of Puberty Blockers in Gender Dysphoric Adolescents and the Position Statement on Use of Puberty Blockers (Evidence Brief).

The Evidence Brief found significant limitations in the quality of evidence for either the benefits or risks (or lack thereof) of the use of puberty blockers. This means there is insufficient basis to say that puberty blockers are safe or reversible (or not) for use as an intervention for gender dysphoria in adolescents:

Evidence about the impact of GnRHa on clinical and mental health and wellbeing outcomes is scarce, with available evidence largely of poor quality. While there are studies on non-medical interventions that show improvements in the mental health and wellbeing of gender-dysphoric adolescents, these generally rely on small, localised cohorts, making it difficult to extrapolate to

other, larger cohorts. In terms of clinical outcomes, bone health and metabolic parameters in particular need ongoing monitoring in gender-dysphoric adolescents prescribed GnRHa.

Legislation and governance mechanisms relating to GnRHa prescription in adolescents has increasingly come under scrutiny internationally. This has resulted in some jurisdictions making substantive changes to prescribing practices. In New Zealand currently, there is no specific legislation related to puberty blockers, only good practice guidelines to enable clinicians to support and manage individuals on GnRHa.

Given the dearth and poor quality of evidence, and New Zealand-specific evidence, there is an urgent need for high-quality, longitudinal data and research to help us understand the specific needs of gender-dysphoric adolescents in New Zealand.

The Evidence Brief concluded that:

Noting that the Government has signalled an intent to consider regulating puberty blocker prescribing in gender-affirming care, clinicians should exercise caution in prescribing. Clinicians who initiate puberty blockers should be experienced in providing gender-affirming care and be part of an interprofessional team offering a full range of supports to young people presenting with gender-related issues

The Ministry then conducted a consultation, which concluded in January this year.

We draw your attention to eight months having passed since then and no action has been taken.

We strongly recommend that you exercise your Ministerial discretion under section 105 of the Medicines Act to restrict the off-label prescription of puberty blockers for those under 18 years of age.

CONTINUED USE OF PATHA GUIDELINES

Your Ministry's own review, published on 21 November 2024, notes there is no sound/quality evidential base for the safe, reversible or even efficacious use of puberty blockers for gender dysphoria in adolescents.

Yet despite this finding in the Evidence Brief, the Ministry has also continued to reference the PATHA Guidelines in the [Position Statement on the Use of Puberty Blockers in Gender-Affirming Care](#) (PS) issued by the Ministry on 21 November 2024.

These Guidelines set out the key considerations for health teams, including the prescribing of puberty blockers which are stated to have a "positive impact" and "to be fully reversible".

The review and position statement are therefore at odds. This remains a contradictory position and the continued use of PATHA guidelines is both erroneous and misleading.

We strongly recommend that the Ministry remove references to PATHA guidelines, which are now very much at odds with not only the Ministry's Evidence Brief but also approaches by many other jurisdictions.

NEW ZEALAND BILL OF RIGHTS ACT

Our legal advice indicates that a declaration from the Courts could be sort that the Government (Minister / Associate Minister / Ministry's conduct) is breaching rights and freedoms under the New Zealand Bill of Rights Act (NZBORA) for failing to protect gender dysmorphic children and teenagers against the prescribing of puberty blockers that have no quality evidence of safety, efficacy or reversibility. This manifests in the failure to regulate under section 105 of the Medicines Act to restrict the prescription of puberty blockers off-label, as some comparable OECD countries have done.

Initial legal advice indicates likely breaches of the following rights and freedoms under sections 8 – 11 NZBORA:

8. Right not to be deprived of life - No one shall be deprived of life except on such grounds as are established by law and are consistent with the principles of fundamental justice.

9. Right not to be subjected to torture or cruel treatment - Everyone has the right not to be subjected to torture or to cruel, degrading, or disproportionately severe treatment or punishment.

10. Right not to be subjected to medical or scientific experimentation - Every person has the right not to be subjected to medical or scientific experimentation without that person's consent.

11. Right to refuse to undergo medical treatment - Everyone has the right to refuse to undergo any medical treatment.

The breaches arise from the lack of quality research on the long-term efficacy, safety and reversibility of puberty blockers and from the misleading nature of the Ministry of Health Guidance which still references the PATHA Guidelines stating that puberty blockers are safe, effective and reversible.

This impacts informed consent if the doctor, parents or affected adolescent are all following that MOH Guidance.

CONCLUSION

We urge you as Minister to align regulations and Ministry guidance in line with the best evidence currently available.

The Ministry of Health's own Evidence Brief has outlined that there is insufficient basis to say that puberty blockers are safe or reversible (or not) for use as an intervention for gender dysphoria in adolescents. That such puberty blockers continue to be used, off-label, to young people as a form of experiment is deeply concerning.

We would also remind the Minister that **consent is not possible when there is insufficient evidence about the efficacy of the treatment or the resultant complications following use of puberty blockers**; put another way, it is impossible for anyone – let alone an under 16 – to consent to a treatment that itself is not understood nor has sufficient evidence to support it.

We welcome your consideration of these matters including the further legal advice we have obtained. We once again strongly encourage the Minister to respond to the findings of the Ministry of Health's Evidence Brief which clearly indicates that the use of puberty blockers must be restricted for those under 18 years of age.

Yours sincerely



Bob McCoskrie
CEO / Founder



Simon O'Connor
Director – Strategic Engagement