

**31 July 2024**

**Melanoma Network of New Zealand**

**New Zealand Skin Cancer Primary Prevention and Early  
Detection Strategy - Draft for Consultation**

Tēnā koutou katoa.

Thank you for the opportunity to provide feedback on two consultation drafts you have issued – New Zealand Skin Cancer Primary Prevention and Early Detection Strategy, and a Supplementary Information document.

The Royal Australasian College of Surgeons (RACS) is the leading advocate for surgical standards, professionalism and surgical education in Aotearoa New Zealand and Australia in nine surgical specialties. RACS is a not-for-profit organisation that represents more than 7000 surgeons and 1300 surgical trainees and International Medical Graduates across Australasia. RACS also supports healthcare and surgical education in the Asia-Pacific region and is a substantial funder of surgical research.

RACS supports MelNet in producing a skin cancer primary prevention and early detection strategy. Our mission is to improve access, equity, quality and delivery of surgical care that meets the needs of our diverse communities. We have applied that lens to your draft strategy. The key points of our feedback are:

- We suggest you make it clear the scope of the strategy is prevention and early detection of all the many 'skin cancers' (plural) in Aotearoa New Zealand. All skin cancers are included, yet most of the statistics are for melanoma. The footnote on page 3 doesn't seem helpful. A better definition in the strategy of the types of skin cancers and the relative risk each presents to patients would provide a more balanced view of the problems. The pie charts on page 6 show the high spend on removing generally less aggressive non melanoma skin cancers, yet low productivity loss, whereas the impact of melanoma on productivity is much higher. The differences are better defined in the supplementary document. You could assist in signalling the scope of the strategy by changing:
  - the title to include 'skin cancers' (plural)
  - the first sentence on page 2 to include '... all skin cancers'
  - the first sentence on page 3 to 'New Zealand has one of the highest rates in the world of the incidence and mortality from skin cancers, ....'
- We would like to see greater consideration given to the current inequity of access, delivery and outcomes for Māori. While the supplementary information indicates the incidence of melanoma is less for Māori and Pacific Peoples, it also indicates the incidence of invasive melanoma in Māori is increasing. The supplementary information indicates Māori are more likely to die of melanoma than non-Māori, yet this isn't presented in the draft strategy. Further, the draft strategy does not specifically address ensuring equity of access, delivery and outcomes for Māori.
- We suggest you refer to Aotearoa New Zealand rather than New Zealand.

We would be more than happy to discuss these points and you are welcome to publish this submission.

Nāku noa, nā

**Ros Pochin**  
**Chair, Aotearoa New Zealand National Committee**

