

# DANNY KRUGER MP



## HOUSE OF COMMONS

LONDON SW1A 0AA

Dr Paul Chrisp  
Director of the Centre for Guidelines  
NICE

2<sup>nd</sup> December 2021

Dear Paul,

We are writing regarding the draft guidance consultation on Safe Prescribing and Withdrawal Management (GID-NG10141).

As a stakeholder, the APPG for Prescribed Drug Dependence will be submitting its response over the next few days via the consultation process. The draft guideline contains many important recommendations which will be welcomed by patient groups and campaigners, particularly around safe prescribing. However we thought we should draw your attention to an area of concern.

This guideline is supposed to support both safe prescribing and withdrawal management. Yet the withdrawal management sections do not currently provide the basic slow tapering information needed to enable patients to withdraw safely.

This is because it does not contain any detail on tapering rates, the interval between dose reductions, how to reduce doses and the overall duration of the taper. Nor does it make clear that withdrawal symptoms can last for months or longer, as acknowledged in the 2019 PHE Prescribed Medicines Review.

We appreciate that there are no RCTs in support of slow tapering, and it is unfortunate that very little research has been conducted in this area. There is, however, relevant guidance in the BNF which is published online by NICE, in the NICE Clinical Knowledge Summary on benzodiazepines and Z-drugs, as well as in a recent publication of the Royal College of Psychiatrists on Stopping Antidepressants which has been endorsed by NICE. Together, these provide the basic tapering information which would enable doctors and prescribers to support safe withdrawal. Links to these documents are provided below:

<https://cks.nice.org.uk/topics/benzodiazepine-z-drug-withdrawal/management/benzodiazepine-z-drug-withdrawal/#withdrawing-a-benzodiazepine>

<https://bnf.nice.org.uk/treatment-summary/hypnotics-and-anxiolytics.html>

<https://www.rcpsych.ac.uk/mental-health/treatments-and-wellbeing/stopping-antidepressants>

Furthermore, there are researchers, charities and patient group representatives who could provide expert testimony in support of slow tapering.

We therefore urge NICE and the guideline committee to include a summary of the basic slow tapering information provided in these documents so that this new guideline can be as effective as possible.



We also draw your attention to the attached Statement of Support for our position signed by various organisations, including all the current dedicated UK withdrawal services, the International Institute for Psychiatric Drug Withdrawal and key psychological therapy bodies.

We look forward to hearing from you.

Yours sincerely,

Handwritten signature of Danny Kruger in black ink.

Danny Kruger MP  
Chair

Handwritten signature of Lord Crisp in black ink.

Lord Crisp  
Co-Chair