



National Pharmaceutical Services Association's application for authorisation AA1000480

The Pharmacy Guild of Australia (Guild) is the national peak pharmacy organisation representing community pharmacy. It strives to promote, maintain and support community pharmacies as the most appropriate primary providers of health care to the community through optimum therapeutic use of medicines, medicines management and related services.

Response

The Guild supports the request from the National Pharmaceutical Services Association (NPSA) for the NPSA and Community Services Obligation (CSO) Distributors to collaborate and share information that will improve the distribution and supply of essential medicines to address the disruptions in access to medicines being experienced by community pharmacies and consumers due to COVID-19.

While medicines shortages have been a long-term problem in Australia, particularly for prescription medicines, COVID-19 has had a significant impact on medicine accessibility due to a combination of factors, including but not limited to:

- Panic stockpiling of medicines by consumers
- Stockpiling by pharmacies
- Prescriber behaviour providing prescriptions for patients for quantities in excess of standard use
- Local supply and distribution disruptions
- Global supply and distribution disruptions
- Manufacturing problems

The Guild along with the NPSA and its members have been long-standing members of the Medicine Shortages Working Party managed by the Therapeutic Goods Administration (TGA). This Working Party is now meeting weekly to oversee and manage emerging medicine supply problems.

It has been evident that CSO Distributors have much information not associated with pricing that is of value in planning and managing problems associated with the supply and distribution of medicines. Enabling these distributors to share information through the NPSA and with other key stakeholders is essential to effective and expeditious management of medicine supply problems at both a national and regional level.

We note that the NPSA does not include all CSO Distributors as members, but that the authorisation provides the discretion for non-members to participate in this important work. This is very welcome to the Guild.

One matter that we feel needs to be managed is that arrangements should be in place to ensure that the work done under this authorisation is not used to preferentially advantage any of the participants customers. There is a perception in the pharmacy sector that in these exceptional circumstances, some major pharmacy groups and banners may have preferential access to medicine supplies. Irrespective of whether this perception is substantiated, it remains a conflict which must be managed and the Guild has confidence that it can.

National Secretariat

It is also critical that the work done under this authorisation also permits interaction and information sharing as needed with key stakeholder groups, including pharmacy peak bodies such as the Guild.