



Your Community Pharmacist: the health professional you see most often

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30 May 2011

Niall Baker

Policy Planner

Matamata-Piako District Council

Sent via e-mail to: NBaker@mpdc.govt.nz

Dear Niall,

PROPOSED TRADE WASTE BYLAW 2011

Thank you for the opportunity to provide feedback on the above proposal to add "any pharmaceutical liquid waste" to the schedule of prohibited wastes in the Trade Waste Bylaw currently under review by the Matamata-Piako District Council.

The Pharmacy Guild of New Zealand (Inc) (the Guild) is a national membership organisation representing community pharmacy owners. We provide leadership on all issues affecting the sector and advocate for the business interests of community pharmacy.

The Guild does not support the proposal.

Pharmaceutical liquid waste does not have the characteristics of prohibited trade wastes, as per Section 1B.2.3 of the bylaw. Medicines dispensed and sold in New Zealand have been approved by the Minister of Health, and evaluated by Medsafe, the New Zealand Medicines and Medical Devices Safety Authority.

Moreover, only a very small volume of liquid waste (mostly reconstituted liquid antibiotics) is generated by community pharmacy or brought to the pharmacy for disposal by patients as returns. The community pharmacists we have spoken to in the area report that the amount of liquid waste per day averages between 78ml and 120ml (between one third to half a cup). Pharmacy disposes of this down the sink or toilet. The Guild understands that this amount is not only incredibly slight, but likely pales in comparison to the amount of consumed pharmaceuticals naturally excreted every day by patients and those disposed of by residential households down the drains and as part of solid household wastes.

The Guild understands that Midland Community Pharmacy Group has had a waste contract from the Waikato District Health Board for several years. This service is funded by the DHB. There is concern that pharmacy will be prohibited from disposing liquid waste in the current fashion, and that a new (and potentially costly) facility may be

required. We are concerned that the proposal will have detrimental funding implications for pharmacy and/or the DHB. While the volume of liquid waste currently disposed of by pharmacy is insignificant, a sample pharmacy in your area that analysed their records for the three months of 1 January – 31 March 2011, reports that there were 190 glass bottles containing antibiotics requiring disposal. This was because the volume of medicine prescribed was different to the volume contained within the original packaging. The same pharmacy processed over 46 thousand prescriptions during that three month period.

The Guild recommend that the District Council reconsiders the inclusion of "any pharmaceutical liquid waste" to the schedule of prohibited waste in the Trade Waste Bylaw. We recommend that the District Council undertake to quantify the amount of liquid pharmaceutical waste, and the type of this waste, in order to substantiate the problem, if any. We also recommend that the cost of relocating disposed waste from pharmacy to a landfill or incinerator is investigated. We suggest that a more effective investment of resources would be promotion of the facility to return unused medicines to community pharmacy for safe disposal, in coordination with the DHB.

Thank you for taking the time to read our feedback.

Yours sincerely

A handwritten signature in black ink, appearing to read "Annabel Young". The signature is written in a cursive, flowing style.

Annabel Young

Chief Executive