

5 June 2026

PHARMAC
PO Box 10254
The Terrace
Wellington 6143

Sent via email to: ecfreview@pharmac.govt.nz

Dear Sir/Madam,

Re: Feedback on the Exceptional Circumstances Framework

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

We support Pharmac's review of the Exceptional Circumstances Framework and agree that the current arrangements can be difficult to understand, operationally complex, and insufficiently transparent.

From a community pharmacy perspective, the success of any redesigned framework will depend on whether it improves patient access while reducing administrative complexity and avoiding the transfer of additional unfunded workload to frontline healthcare providers.

We encourage Pharmac to ensure that any future framework is guided by the following principles:

- National consistency of decision-making and operational processes.
- Transparency of approvals, waivers, and exceptional access decisions.
- Integration with prescribing and dispensing systems.
- Continuity of access to funded medicines.
- Minimisation of administrative burden for patients, prescribers, and pharmacies.

Community pharmacies should not be required to manually interpret, verify or administer exceptional access arrangements where these functions could be automated or centrally managed.

We also encourage Pharmac to ensure that patient communication and clinician education are nationally coordinated. Without clear and consistent messaging, patient confusion and dissatisfaction are often redirected to community pharmacies, which are frequently the most accessible point of contact within the health system.

In addition, we recommend that the review consider the following operational issues:

Visibility of approvals

Approvals, waivers, and exceptional funding decisions should be visible within prescribing and dispensing systems. Pharmacists should not be required to verify approvals through patients, prescribers, hospitals, or Pharmac before supplying treatment. Timely visibility of approvals would

improve efficiency, reduce treatment delays, and minimise the risk of patients presenting to pharmacies expecting funded access where approval status cannot readily be confirmed.

Alternative brand pathways

We support the development of a nationally consistent alternative brand pathway with standard eligibility criteria, application processes, renewal requirements, and communication templates. This would reduce confusion and administrative burden for patients, prescribers, and pharmacies during future brand changes and help ensure a more consistent national approach to managing brand-related funding exceptions.

Impact on community pharmacy workload

Community pharmacies are frequently the first point at which patients become aware of funding restrictions, expired approvals, declined applications, or changes to funding eligibility. The framework should minimise situations where pharmacies are required to explain, interpret, or resolve funding decisions without access to complete information.

We encourage Pharmac to consider the cumulative impact of exceptional access processes on community pharmacy workload. Activities such as verifying approvals, resolving funding queries, liaising with prescribers, supporting patients through funding processes, and managing funding-related medicine access issues represent significant administrative work that is generally not recognised or funded. Processes that create additional administrative burden reduce the time available for pharmacists to provide direct patient care and clinical services.

Continuity of medicine supply

Community pharmacies often manage the consequences of delayed approvals, expired approvals, or uncertainty regarding funding eligibility. Any revised framework should support continuity of treatment and minimise situations where patients experience delays in accessing funded medicines due to administrative processes. Where renewal applications are required, processes should be designed to minimise gaps in treatment and avoid unnecessary disruption for patients and healthcare providers.

Equity through primary care access

We support efforts to improve equitable access to medicines regardless of geography, socioeconomic circumstances, or specialist availability. Community pharmacies are often the most accessible healthcare providers in rural and underserved communities and frequently assist patients to navigate funding and access pathways. The design of any future framework should recognise the important role community pharmacies play in supporting equitable access to funded medicines and reducing barriers to treatment.

Digital integration

Digital integration should be a core design principle of any revised framework. Application processes, approvals, waivers, and exceptional access decisions should integrate directly with existing prescribing and dispensing systems wherever possible. Pharmacists should be able to readily identify funding approvals at the point of dispensing without requiring separate access to external systems, manual verification processes, or contact with prescribers and funding agencies. Improved digital integration would reduce duplication, improve transparency, minimise administrative burden, and support more efficient medicine supply.

Medicine procurement and stock management

Any revised framework should also consider the impact of exceptional access arrangements on medicine procurement and stock management. Clear and timely communication regarding approvals and eligibility supports pharmacies to manage stock appropriately, reduces the risk of medicine wastage, and helps ensure medicines are available when required by patients.

Where exceptional access arrangements involve medicines with limited availability, supply constraints, or higher acquisition costs, pharmacies require sufficient visibility and certainty to effectively manage inventory and maintain continuity of supply.

Broader system impacts

The discussion document identifies the importance of considering wider societal and fiscal impacts when making funding decisions. We encourage Pharmac to consider the operational impacts on frontline healthcare providers. Processes that create significant administrative workload for community pharmacies divert clinical time away from patient care, reduce overall health system efficiency, and can create unnecessary barriers to medicine access.

A framework that is operationally practical and digitally enabled will support better outcomes for patients while reducing costs and inefficiencies elsewhere in the health system.

Implementation and change management

Any significant changes to the Exceptional Circumstances Framework should be supported by comprehensive implementation planning, including system updates, clear operational guidance, and nationally consistent communication to healthcare providers.

Community pharmacies should not be expected to implement new processes without adequate lead-in time, supporting resources, and clear guidance regarding operational requirements. Early engagement with community pharmacy software vendors and healthcare providers will be important to ensure any future framework is practical, efficient, and capable of being implemented consistently across the country.

Thank you for the opportunity to provide feedback. If you have any questions about our feedback, please contact our Senior Advisory Pharmacists, Martin Lewis (martin@pgnz.org.nz, 04 802 8218) or Cathy Martin (cathy@pgnz.org.nz, 04 802 8214).

Yours sincerely,



Nicole Rickman

General Manager – Membership and Professional Services