

5 September 2023

PHARMAC  
PO Box 10254  
The Terrace  
Wellington 6143

Sent via email to: [consult@pharmac.govt.nz](mailto:consult@pharmac.govt.nz)

Dear Sir/Madam,

**Re: Consultation on supporting a potential brand change for dabigatran capsules**

Thank you for the opportunity to provide feedback on the above consultation.

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

Our feedback on this consultation focuses on Guild members' concerns around general economic, funding and supply issues.

We would like to voice our support for a potential brand change to a generic product for dabigatran capsules. The introduction of generic alternatives can promote competition, accessibility, and affordability, ultimately benefiting patients as the savings can be utilised to reinvest into other medicines. We do not foresee any major issues transitioning patients to a generic brand of this particular medicine, as the effects of dabigatran are not directly quantifiable or directly measurable as long as the replacement product is qualitatively equivalent.

We propose the following measures to facilitate a smooth and effective transition when appropriate:

**1. Information pamphlets and collateral**

It is crucial to provide collateral that community pharmacies can distribute to their patients. These resources should comprehensively explain the brand name change, address common concerns, and emphasise the equivalence of the generic product in terms of safety and efficacy. This will save time at pharmacy level given staff shortages and pressures. The collateral should include:

- Clear and well-detailed information for patients regarding the brand change, including the reason for changing, key dates of the change, and information on generic medicines.
- Printed collateral available in both English, Te Reo Māori and other languages to accommodate a diverse patient population.
- The use of full-colour materials to visually demonstrate changes in appearance of the medicine and packaging, minimising any confusion at patient level.
- Timely and accurate information provided to prescribers and community pharmacies to ensure health professionals can address patient enquiries

effectively and prepare them for the change, such as differences between the current and new brand, e.g., excipients, storage conditions, etc.

**2. Clarity on repacking stability**

To avoid any confusion or misconceptions, we recommend allocating supply to a generic product with clear and established stability data that proves or supports the ability to blister-pack or compliance-pack the medicine when required. Pharmac should have this endorsed by Medsafe, if possible, to avoid time wasting queries or uncertainty. As you know this has been an issue with the current Pradaxa brand. If no generic products can be found to be stable when dispensed into blister or compliance packs, then consideration should be made as to the size of the medicine and its packaging so that it can be dispensed in some way into adherence aids to assist long-term condition patients.

**3. Appropriate transition period**

We believe that the proposed five-month transition period is sufficient for patients to adjust to the brand change, as long as prescribers are being thoroughly informed and prepared for the upcoming change and sufficient collateral is created for patients to educate them on the upcoming change.

**4. Pack sizes**

Preference should be given to ready-to-dispense pack sizes that align with general dosage indications, such as 60 capsules (as opposed to “calendar pack” of 28’s or 56’s). This approach simplifies prescription management and enhances patient convenience and reduces medicine wastage.

Thank you for your consideration of our response. If you have any questions about our feedback, please contact our Senior Advisory Pharmacists, Martin Lowis ([martin@pgnz.org.nz](mailto:martin@pgnz.org.nz), 04 802 8218) or Cathy Martin ([cathy@pgnz.org.nz](mailto:cathy@pgnz.org.nz), 04 802 8214).

Yours sincerely,



**Nicole Rickman**

General Manager – Membership and Professional Services