

10 October 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: Proposal to amend Pharmaceutical Schedule Rules to align funding with the Misuse of Drugs Amendment Regulations**

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.

The Guild supports the proposed changes as they represent a thoughtful effort to harmonise funding rules with legal standards and establish consistency across prescriber categories, while also maintaining a sustainable balance between control and access.

However, we are disappointed that the implementation date for these funding changes has been set for 1 November 2023. This creates another instance of what we perceive as a 'double disruption' occurring, with the introduction of the legislation and associated funding changes happening on different dates.

Thank you for your consideration of our response. If you have any questions about our feedback, please contact our Senior Advisory Pharmacists, Martin Lewis ([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