

9 February 2024

PHARMAC
PO Box 10254
The Terrace
Wellington 6143

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

Dear Sir/Madam,

Re: Proposal to decline inactive funding applications

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

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 support the proposal to decline inactive funding applications, recognising the need for efficient resource allocation and for the public to be able to view Pharmac's decision, even if it is to decline funding. However, as sector representatives and stakeholders in the healthcare sector, we are keen to understand certain key points related to this proposal.

Firstly, we are curious to know if Pharmac currently collects data on *unfilled* prescriptions? Understanding the demand for products not currently on the Schedule is crucial, particularly with a large number of overseas-born general practitioners and specialists in New Zealand who may be accustomed to having these products available or have experienced therapeutic success in the past with these products overseas.

Secondly, we are interested about applications that have been declined in the past due to lack of a Medsafe-approved product available in New Zealand - are they revisited at a later date when a product is approved or is it the responsibility of the supplier to reapply for consideration? Similarly, if Pharmac declines an application due to limited clinically relevant benefit and poor generalisability to the New Zealand context, does Pharmac revisit the application at a later date when evidence is available or is it the responsibility of the supplier to reapply for consideration?

Lastly, we are interested in whether there is a fast-track solution in place for products that were previously declined based on economic considerations and not on clinical grounds? In cases where an equivalent product goes out of stock, such as was recently the case with Dapagliflozin- and/or Canagliflozin-analogues, it would be valuable to know if there are mechanisms to reconsider past declined alternative products swiftly, ensuring that there are still alternatives within a medicine class that can be introduced to the market within a short timeframe. Also, in situations where Pharmac is not aware of any supplier willing to

pursue Medsafe registration at the time of the application, we would like to understand the process that Pharmac undertakes to identify this.

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, 04 802 8218) or Cathy Martin (cathy@pgnz.org.nz, 04 802 8214).

Yours sincerely,



Nicole Rickman

General Manager – Membership and Professional Services