

5 July 2024

PHARMAC PO Box 10254 The Terrace Wellington 6143

Sent via email to: <a href="mailto:consult@pharmac.govt.nz">consult@pharmac.govt.nz</a> and <a href="mailto:consult@pharmac.govt.nz">enquiries@pharmac.govt.nz</a>

Dear Sir/Madam.

## Re: Proposal to fund supplements for phenylketonuria and other inherited metabolic diseases

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 and professional interests of community pharmacy.

Our proposal focuses on Guild members' concerns around general economic, funding and supply issues. Guild submissions should not be taken as any endorsement of, or any attempt to comment on, issues of safety, efficacy, or individual patient utility.

We would like to express our strong support for the proposal to fund a broader range of nutritional supplements for individuals with phenylketonuria (PKU) and other inherited metabolic diseases, as this will simplify the criteria and better align these products with current prescribing practices.

## Reduction of administrative burden

One of the most significant benefits to this proposal is the reduction of the administrative burden on community pharmacies. Currently, some patients receive these essential supplements through Pharmac's Exceptional Circumstances Framework (NPPA). This process involves extensive paperwork and time-consuming administrative tasks, which can be a barrier to the timely access to these products and efficient patient care. The proposed changes will streamline the process for patients to access their essential supplements, allowing pharmacists to focus more on the care of their patients rather than administrative duties.

Simplifying the eligibility criteria for these nutritional supplements will also reduce the confusion and queries from patients, ensuring a more consistent application of guidelines across all healthcare providers, which in turn will enhance the overall patient experience and save clinician consultation time.

## Investigating product pricing

While we fully support expanding the product base in this category and increasing access for patients who need these supplements, we urge Pharmac to urgently investigate the current pricing structure for all special foods and introduce necessary pricing adjustments to the Schedule.

Recent evaluations by the Guild, Pharmac, and Propharma have highlighted that community pharmacies often barely break even when providing special food products and pharmacies are not being fairly compensated for this work. Ensuring that pharmacies are adequately

**Phone:** 04 802 8200

Website: www.pgnz.org.nz

Email: enquiries@pgnz.org.nz

remunerated will encourage them to keep these items in stock or even be open to ordering certain products for a specific patient, thereby increasing availability and access for eligible consumers.

## Increased accessibility for patients

Ensuring these supplements for patients with inherited metabolic diseases are readily available on the Pharmaceutical Schedule promises a more stable and reliable supply, which can be crucial for managing these conditions effectively.

Moreover, aligning the eligibility criteria with current prescribing practices ensures that more patients who need these supplements can access them without unnecessary barriers.

If you have any questions about our response, please contact our Senior Advisory Pharmacists, Martin Lowis (<a href="mailto:martin@pgnz.org.nz">martin@pgnz.org.nz</a>, 04 802 8218) or Cathy Martin (<a href="mailto:cathy@pgnz.org.nz">cathy@pgnz.org.nz</a>, 04 802 8214).

Yours sincerely,

Nicole Rickman

General Manager – Membership and Professional Services