

15 August 2024

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 fund oestradiol gel and to award Principal Supply Status to Estrogel**

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 strongly support the proposal for Pharmac to fund oestradiol gel as another hormone replacement therapy (HRT) option for New Zealanders without dispensing and eligibility restrictions. We believe it is a welcome development given the current worldwide supply constraints of HRT patches and will provide clinicians and patients with a broader range of effective and available treatment options.

**Support and resources for patients starting on oestradiol gel**

To ensure successful initiation of oestradiol gel therapy, patients would benefit from:

- **Comprehensive educational materials:** Easily understandable and accessible education resources should be available, detailing the application process, expected benefits, and potential side effects. Visual aids and step-by-step instructions should be included to enhance patient understanding and adherence. These resources should preferably be available online as well as from pharmacies via pre-printed flyers that can be handed out and discussed with a patient at the initiation of treatment.
- **Access to healthcare providers:** Regular consultations with healthcare providers, particularly in the initial stages when oestradiol gel is prescribed, are essential for monitoring the patient's response to treatment, adjusting dosages as necessary, and addressing any concerns.
- **Support networks for patients:** Availability of support groups or controlled online forums will provide platforms for individuals to share their experiences on this new HRT treatment option and seek healthcare professional advice, ensuring ongoing support and engagement with their treatment.

**Support for patients transitioning from other forms of oestradiol**

For patients transitioning from oestradiol patches or another form of HRT to the oestradiol gel, it is crucial to provide:

- **Guidance on transitioning:** Detailed information should be available to patients on how to safely transition from HRT patches or another form of HRT to the oestradiol gel, including managing potential overlap in treatments and any withdrawal or adjustment symptoms.
- **Consultation with healthcare providers:** Personalised guidance with a healthcare professional is essential for a patient when transitioning from HRT patches or another form of HRT to the oestradiol gel, to determine the appropriate dosage when switching forms and to monitor any changes in symptoms or side effects. We are interested to know if Pharmac will be making funds available to patients who wish to switch to this new HRT treatment option but will require a new prescription from their prescriber to be able to do so, or what other form of support these patients will have available to them.
- **Adherence support:** Tools such as reminder apps or calendars could be offered to help patients establish and maintain a routine with the use of oestradiol gel, which may differ from their previous treatment method.
- **Brand Switch Fee:** We strongly advocate that Pharmac allow community pharmacies to claim a funded Brand Switch fee for patients transitioning from one HRT dosage form to another, not only when switching from the patches to the gel, but also switching back to the patches if the gel does not seem effective and/or stock supply issues force these changes.

### **Healthcare professional support for prescribing of oestradiol gel**

Healthcare professionals require robust support and resources to ensure effective prescribing and patient management in the prescribing of oestradiol gel:

- **Training and education:** Comprehensive training on pharmacokinetics, dosing, and application of oestradiol gel is necessary for prescribers. This should include comparisons with other HRT forms to enable informed decision-making. Easy to follow and printable conversion charts in a quick reference form are essential.
- **Clinical guidelines:** Access to updated clinical guidelines providing evidence-based recommendations for prescribing oestradiol gel is vital. These guidelines should cover indications, contraindications, and monitoring requirements.
- **Patient education resources:** Pre-prepared educational resources should be available for healthcare professionals to distribute to their patients when prescribing oestradiol gel to ensure patients receive accurate and consistent information from whoever they see.

### **Addressing health disparities and supporting diverse populations**

To ensure equitable access and effective use of oestradiol gel, the following considerations are important:

- **Culturally appropriate resources:** Educational resources should be available in multiple languages and tailored to the cultural and linguistic needs of diverse populations, including Māori and Pacific peoples, and other underserved communities.
- **Improved access to care:** Initiatives should be introduced to enhance access to healthcare services, particularly in rural and underserved areas, ensuring that all individuals can receive the necessary support when starting or transitioning to oestradiol gel.
- **Outreach programmes:** Specific outreach programmes aimed at populations experiencing health disparities are required to ensure these groups are informed about the availability of oestradiol gel and how to access it.

### **Inclusive communication and tailored support**

To ensure people using and accessing oestradiol gel, including women and those from rainbow communities, are supported, the following resources are crucial:

- **Inclusive communication:** Healthcare providers should receive access to appropriate training on how to communicate effectively with users of oestradiol gel, in particular those from rainbow communities, to ensure there is a reduction in unconscious bias and establishment of a comfortable environment for discussing their needs and concerns regarding oestradiol gel and other treatment options.
- **Tailored support:** Specific guidance and support should be provided for transgender and non-binary individuals on the use of oestradiol gel as part of their hormone therapy regimen, including any special considerations. There should also be guidelines available for prescribers and pharmacists regarding the funding limitations of supply to individuals who might not have traditionally been seen as end users of these products.
- **Peer support:** Access to support groups and networks specifically for women and rainbow communities should be facilitated, offering a safe space for sharing experiences and receiving peer support.

### **Pharmacist support for dispensing and patient counselling to patients on oestradiol gel**

Pharmacists play a crucial role in the successful use of oestradiol gel. To support them, the following are necessary:

- **Training on product use:** Pharmacists should receive detailed training and resources on the pharmacokinetics, dosing, and application of oestradiol gel, as well as information addressing common patient questions and troubleshooting application issues. Online references should be readily available via QR-codes and trusted online reference providers.
- **Patient counselling protocols:** Standardised counselling protocols should be developed to ensure pharmacists provide consistent and accurate advice on oestradiol gel, covering application, managing missed doses, swapping/dose conversions and handling side effects.
- **Access to information:** Pharmacists should have ready access to up-to-date clinical information and guidelines and pre-printed educational support resources to share when counselling patients on oestradiol gel, ensuring there is consistent and accurate guidance to all patients on the use of oestradiol gel.
- **Brand Swap Fees:** Pharmacists should be entitled to the payment of a Brand Switch Fee, as mentioned earlier, and not limited to one per patient to allow for swapping between brands and dosage forms due to supply constraints with oestradiol products.

### **Clinical and supply considerations for clinicians and pharmacists**

To facilitate a smooth transition for patients switching from oestradiol patches or another form of HRT to the oestradiol gel, we encourage Pharmac to contract He Ako Hiringa or bpacNZ to provide clinical training based on best practice clinical evidence, including articles, webinars and resources such as conversion tables, to guide appropriate prescribing, dosing adjustments, and counselling. These resources should be referenced in clinical guidelines and made readily available to both prescribers and pharmacists.

We also believe it is imperative that Pharmac provides clear and comprehensive guidance to pharmacists on how to transfer patients between different forms of oestradiol while avoiding funding pitfalls. This guidance should include best practice for dosing, monitoring, and managing potential side effects during the transition. But more importantly, we encourage Pharmac to have a process in place if there is a need to transition patients mid-prescription from one oestradiol dosage form to another due to supply constraints, without payments from claims for these prescription changes being delayed or rejected by Health New Zealand, and patients being asked to obtain new prescriptions and pay additional prescription co-payments.

Additionally, we would like to recommend that more than one brand of internationally available oestradiol gel be listed as a funded option. Given the current international supply-demand disparities with oestradiol patches, this precautionary measure will help mitigate potential supply issues with oestradiol gel, especially given that this group of patients have had to endure multiple supply issues recently.

Guild pharmacists have had limited personal experience with Femigel, a product similar to oestradiol gel which is available in South Africa and the United Kingdom, but patient experiences from these countries have been positive. The ease of use and effectiveness in managing symptoms underscore the importance of providing patients with alternative dosage forms of oestradiol. This flexibility is crucial for ensuring adherence and improving patient outcomes, especially for those who may struggle with other HRT formulations.

If you have any questions about our response, 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