

24 January 2025

Pharmacy Council of New Zealand  
Level 7  
22 The Terrace  
Wellington 6143

Sent via email to: [projects@pharmacycouncil.org.nz](mailto:projects@pharmacycouncil.org.nz)

Dear Sir/Madam,

**Re: Pharmacy Council engagement on changes under consideration for Pharmacist Prescribers scope of practice**

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

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.

While we do not represent pharmacist prescribers, we would like to comment on some of the aspects of the engagement document.

**Practice Plan**

We recognise that the Practice Plan serves as a crucial document outlining the boundaries of an individual's prescribing scope, ensuring they work within a collaborative healthcare team, and sets regulatory limits to protect pharmacist prescribers from undue demands on their practice. If concerns arise about a pharmacist prescriber's performance, the Practice Plan would be part of the Council's consideration.

For this reason, we believe it is essential to maintain the current requirement for a Practice Plan, including for experienced pharmacist prescribers. Adapting regulations to reflect professional maturity is a progressive approach and reducing regulatory burdens as pharmacist prescribers gain experience is a positive step, demonstrating trust in self-regulation and rewarding competency. However, if the Council decides to exempt experienced prescribers from submitting an annual Practice Plan, we believe an alternative form of evidence should be required to ensure ongoing safe practice.

Additionally, enhancing support for new pharmacist prescribers through structured mentoring and peer networks will provide critical support for less experienced prescribers, fostering safe practices, growth, and confidence. While we encourage all pharmacists to engage with their peers for support, if the Council chooses that the Practice Plans of less experienced prescribers are to be endorsed by suitably experienced prescribers, we will need clarity on who will fund this initiative, as it would require considerable time from experienced professionals.

**Recertification requirements**

We believe that the current recertification requirements for pharmacist prescribers should remain unchanged. All pharmacists, whether prescribers or not, have a professional obligation to maintain their competence and engage in professional development activities that are relevant

to their specific practice. Under the self-regulatory model, pharmacist prescribers should be responsible for undertaking continuous professional development that aligns with their evolving roles and areas of expertise. This ensures that they remain up to date with the latest advancements and best practices in prescribing, ultimately safeguarding patient care.

The importance of ongoing professional development cannot be overstated, as it not only strengthens the individual practitioner's knowledge and skills but also enhances the broader healthcare system by fostering a culture of continuous learning. As healthcare practices and treatment protocols evolve, pharmacist prescribers must stay informed and adapt to changes, ensuring they continue to provide safe, effective, and evidence-based care. Maintaining current recertification requirements supports this process and ensures that the regulatory framework remains robust and relevant, without imposing unnecessary burdens on the prescriber.

### **Challenges with the current pharmacist prescriber framework**

The current pharmacist prescriber framework, while a step forward, has several key limitations that hinder its full potential. First, the role has not achieved its goal of expanding pharmacists' scope of practice or alleviating the prescriber shortages seen in New Zealand's healthcare system. The requirement for pharmacists to work within prescribing teams further limits their autonomy, making the role less appealing and reducing its overall effectiveness. As of 2024, there are only 74 pharmacist prescribers (1.7% of the workforce) in New Zealand. In contrast, the United Kingdom boasts over 14,600 pharmacist prescribers, representing 22%-34% of their workforce, and Alberta, Canada, has embraced independent prescribing for pharmacist prescribers, which has significantly improved healthcare delivery and access.

This stark contrast in numbers highlights the need for a clearer and more defined role for pharmacist prescribers within New Zealand's healthcare system. At present, it is often more attractive for pharmacists to pursue a clinical pharmacist qualification, which can be more financially rewarding and offers greater career progression. Furthermore, the limited scope of practice of current pharmacist prescribers, such as the inability to prescribe and dispense for a single patient, undermines the core functions of the role. To address these challenges and encourage greater uptake, there needs to be a comprehensive review of the framework, focusing on enhancing pharmacists' autonomy, expanding their prescribing capabilities, and aligning the role with the evolving needs of the healthcare system.

### **Recommendations for reform**

To address the limitations of the current pharmacist prescriber framework and build on existing initiatives, we would like to take the opportunity to recommend the following reforms:

- Introduce pathways for autonomy
  - Enable experienced pharmacist prescribers to practice independently upon meeting clearly defined competency standards, following the models used by midwives and podiatrists.
  - Establish a structured, phased pathway for newly qualified prescribers, offering clear milestones and support to facilitate a smooth transition to independent practice to guide their development.
- Align with international best practices
  - Simplify training and reduce regulatory barriers, drawing inspiration from the United Kingdom's successful model in supporting pharmacist prescribers through simplified processes.

- Implement financial incentives for training, professional development, and ongoing education, as demonstrated by Alberta's approach to cultivate a well-trained and competent prescribing workforce.
- Expand scope and accessibility of prescribing rights
  - Broaden the scope of prescribing rights to remove restrictions on formulary or protocol-based roles, with a focus on underserved regions where healthcare access is limited, enabling pharmacists to address urgent patient needs.
  - Strengthen mentoring, support systems, and collaborative networks to ensure safe and effective practice across all areas, particularly in rural and remote communities.
- Promote equity and recognition of the pharmacist prescriber role
  - Raise awareness and understanding of the pharmacist prescriber role within the healthcare sector and the public, highlighting its contribution to improving patient care and healthcare delivery.
  - Address disparities in access to prescribing opportunities, ensuring equal distribution of resources and support for pharmacists in all regions, fostering a more inclusive and diverse healthcare workforce.
- Evaluate and refine the impact of pharmacist prescribers
  - Develop and apply robust metrics and frameworks to measure the impact of pharmacist prescribers on patient access, healthcare workforce participation, and safety outcomes, to drive continuous improvement and ensure the health system remains adaptable and effective.

Unlocking the full potential of pharmacist prescribers demands bold, forward-thinking reforms that position pharmacists as key players in healthcare delivery. By adopting international best practices and addressing systemic barriers, the pharmacist prescriber role can become a foundational element of New Zealand's healthcare system, and enhance workforce sustainability and improve patient outcomes, empowering pharmacists to tackle the healthcare challenges of the future, contributing to a more responsive, efficient, and equitable healthcare system for all New Zealanders.

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