

24 March 2025

PHARMAC
PO Box 10254
The Terrace
Wellington 6143

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

Dear Sir/Madam,

Re: Proposal to fund a new type of insulin for the management of diabetes

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 submission 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.

The Guild fully supports the proposal to fund Ryzodeg (insulin degludec and insulin aspart) without restrictions for people with type 1 and type 2 diabetes and endorse any initiatives that enhance access to essential medicines and expand treatment options to improve diabetes management for patients in New Zealand. We also acknowledge Pharmac's efforts to support patients affected by the discontinuation of several co-formulation products.

We acknowledge that the proposed funding will improve access for patients requiring alternative insulin preparations, especially with the anticipated discontinuation of a range of insulin co-formulations, including NovoMix 30, Mixtard 30, PenMix 30 and PenMix 50. Ensuring timely and effective alternatives is critical for maintaining continuity of care and optimal glycaemic control for those impacted by these changes. While we support the proposal, we encourage Pharmac to consider the following additional measures to ensure a smooth transition for both patients and healthcare providers:

- **Brand-switch fee for community pharmacies** – People living with diabetes rely on precise insulin regimens to maintain their health, and transitioning to a newly funded insulin formulation can be complex and disruptive. This process requires additional time for pharmacists to assess individual patient needs and provide comprehensive patient education to ensure a safe and effective transition. Given the critical role community pharmacies play in supporting patients through this change, we request that a brand-switch fee be introduced to recognise the workload and time involved to help compensate for the additional counselling sessions and coordination with prescribers required to optimise patient outcomes.
- **Collaboration and education of healthcare providers** – We encourage Pharmac to actively engage with community pharmacy and medical professional bodies to ensure clear and consistent communication, along with comprehensive educational training, regarding the introduction of the newly funded insulin co-formulation and the discontinuation of existing formulations. This should include practical resources such as dosing guides, patient counselling materials, and transition protocols to support healthcare providers in safely and

effectively managing patient care and equip pharmacists and prescribers with the necessary knowledge to navigate these changes confidently.

- **Patient support resources** – We request that Pharmac develop and provide comprehensive educational resources to support patients transitioning to a new insulin formulation. These resources should include both printed and digital materials, such as step-by-step instructional videos, FAQs, and multilingual support to accommodate diverse patient needs. We also recommend Pharmac collaborate with healthcare providers to ensure that these resources are effectively distributed through community pharmacies, general practices, and diabetes support organisations to help mitigate confusion, alleviate patient anxiety, and empower individuals to manage their diabetes with confidence.
- **Continuity of care assurance** – We request that Pharmac implements a well-managed transition period with an adequate supply chain to prevent any stock shortages that could result in abrupt medicine changes, particularly for the most vulnerable patients who are at higher risk of complications due to treatment disruptions. A structured approach should include proactive supply chain management, clear contingency plans, and collaboration with suppliers to maintain consistent availability of both the existing and newly funded insulin formulations throughout the transition period. We also request that Pharmac provide timely, transparent, and detailed communication regarding the discontinuation timeframes of the various co-formulations well in advance to healthcare providers, including community pharmacists and prescribers, allowing them to adequately prepare and support patients in making a smooth and safe transition.
- **Equity considerations** – Given that Māori, Pasifika, and lower-income communities may be disproportionately affected by medicine changes, we urge Pharmac to consider targeted outreach and support mechanisms to ensure equitable access and understanding of new insulin options, as well as culturally appropriate education campaigns, in-language resources and tailored support services delivered through trusted health providers. We also encourage Pharmac to collaborate with health professionals, diabetes advocacy groups, and community leaders to identify and address potential barriers to care, including affordability, digital literacy, and health system navigation, to ensure all patients, regardless of socioeconomic background, receive the information, support and continuity of care they need for a smooth and successful transition.
- **Pharmacovigilance and feedback mechanisms** – We recommend that Pharmac establish a robust monitoring and reporting system to track patient experiences and safety outcomes during the transition period to new insulin formulations to identify any clinical concerns, challenges faced by patients and healthcare providers, to ensure timely intervention and resolutions, refine support strategies and ensure that the transition remains patient-centered.

If you have any questions about our feedback, please contact our Senior Advisory Pharmacists, Martin Lewis (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