

15 April 2025

PHARMAC PO Box 10254 The Terrace Wellington 6143

Sent via email to: <u>consult@pharmac.govt.nz</u>

Dear Sir/Madam.

Re: Proposal to fund Estradot as an alternative brand of oestradiol patches

The Pharmacy Guild of New Zealand (Inc.) (the Guild) is a national membership organisation and the largest representative of community pharmacy owners in New Zealand. We provide leadership on all issues affecting the sector and advocate for the business and professional interests of community pharmacy.

This submission focuses on Guild members' concerns around general economic, funding, access and supply issues. Guild submissions should not be taken as any endorsement of, or any attempt to comment on, issues on medicine safety, efficacy, or appropriateness for individual patients.

The Guild strongly supports the proposal to fund both the Estradot brand, supplied by Novartis, and the Estradiol TDP Mylan brand, supplied by Viatris, from 1 December 2025 for individuals who do not produce sufficient oestrogen. We commend Pharmac for considering feedback from the public and healthcare sector regarding the initial decision, made in November 2024, to fund only one brand of oestradiol patches.

The proposed funding of both brands of oestradiol patches reflects the diverse needs, preferences, and clinical experiences of individuals managing menopause symptoms, where many people report differing responses to various brands. This approach supports a personalised model of care that recognises the importance of comfort, familiarity, and individual treatment response, and empowers individuals to make informed decisions about their health, contributing to a sense of control and active participation in their menopause journey. While we are broadly supportive of the proposal, we encourage Pharmac to consider several additional measures to further support patients and healthcare professionals and to ensure the successful implementation of this initiative.

Supply assurance and equitable distribution

We acknowledge the ongoing global supply challenges impacting the availability of oestradiol patches. While the proposal to fund multiple brands is a positive and pragmatic step towards improving supply resilience and reducing the risk of stock shortages, we seek clarification on the strategies Pharmac plans to implement to ensure a consistent and reliable national supply.

Equitable distribution is essential to ensure that individuals across all regions, regardless of location or pharmacy size, have fair access to both brands of oestradiol patches. Transparent and timely communication from Pharmac regarding stock availability, allocation strategies, and contingency plans will be critical in preventing regional disparities and helping healthcare providers manage patient expectations, ensuring continuity of care for patients. We encourage

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Pharmac to maintain proactive engagement with wholesalers, suppliers and the wider sector to enable early detection and response to supply pressures, including stockpiling or distribution gaps that could disadvantage communities.

Healthcare provider communications and education

The availability of multiple brands of oestradiol patches, while beneficial for patient choice and ensuring continuity of supply, may create confusion among healthcare providers regarding appropriate product selection and patient management. To support the safe, consistent and effective use of these medicines, we recommend that Pharmac develop and disseminate comprehensive and practical educational resources for prescribers and pharmacists, outlining the similarities and differences between the brands, which should include information on application techniques, adhesive properties, dosing equivalence, and potential side effect profiles.

Tools should be made available to assist prescribers and pharmacists to have informed conversations with patients, particularly when a switch between brands is necessary due to stock availability, individual tolerability or having to change to a different form of oestradiol. Clear clinical guidance on brand and formulation switching, along with a comparison of dosing strengths, will be essential to minimise confusion and maintain clinical safety.

Given the limited global supply of Estradot, it may become necessary for pharmacists to dispense Estradiol TDP Mylan when prescriptions are written generically, unless the Estradot brand is specifically requested. To ensure this is handled consistently and safely across the sector, clear guidance from Pharmac will be crucial to support pharmacists in making appropriate dispensing decisions and managing patient expectations around brand availability and when substitution is required.

Patient and public communication and education

While the availability of multiple brands of oestradiol patches offers greater flexibility and supports patient-centered care, it may also lead to confusion and uncertainty among patients, particularly when preferred brands are unavailable due to ongoing supply challenges. Managing patient expectations will be essential for patients to understand this reality and for ensuring confidence in treatment and minimising anxiety around brand switches and that alternatives are clinically appropriate and effective.

While the Pharmac website provides updated information on the availability of medicines, this communication channel is not always widely accessed by the general public. We recommend that Pharmac explore a broader range of communication strategies to reach a wider audience, such as public-facing campaigns delivered through social media, community newspapers, and trusted health websites such as Healthify, to help raise awareness about the availability of different oestradiol patch brands, normalise the need for switching to different brands, and empower individuals to make informed decisions about their care.

To support consistent messaging and enhance the patient experience, we also encourage Pharmac to equip healthcare providers with clear, easy-to-use communication tools to be used during consultations and at the point of dispensing to explain supply issues, brand differences, practical considerations like patch size, adhesive quality, appearance, and advice on symptom management. Patient-facing materials such as printable flyers, posters for display in pharmacies and clinics, and digital resources (e.g. QR codes linking to trusted information, short videos, or

infographics) would be highly valuable and could help reduce confusion and anxiety around brand switching, reinforcing the clinical safety and equivalence of available options.

Long-term policy and funding implications

We request that Pharmac reassess the current limit of two oestradiol patches per strength per week to ensure that this restriction does not inadvertently compromise clinical effectiveness or restrict patient access, particularly where certain strengths are under greater demand or subject to ongoing supply constraints. Although the Christchurch Medicines Information Service has advised that oestradiol patches can be cut to achieve the required dose, this practice is not supported by the product datasheets and carries risks, where cutting patches may result in delivering inconsistent doses of the active ingredient, compromising treatment efficacy and patient safety.

Given these concerns, we recommend that Pharmac actively collects and monitors data on oestradiol patch usage patterns to allow for an evidence-based evaluation of whether the current restriction remains fit for purpose and continues to support equitable and effective access across the motu. Where feasible, we also recommend that Pharmac engage regularly with prescribers, pharmacists and other sector stakeholders to better understand the practical impact of the restriction to ensure it reflects real-world use and remains responsive, clinically appropriate and sustainable over the long term.

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