



The Pharmacy
Guild of Australia

SUBMISSION

Royal Commission into National Natural Disaster Arrangements

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National Secretariat

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INTRODUCTION

The Pharmacy Guild of Australia (“the Guild”) welcomes the opportunity to provide a submission to the *Royal Commission into National Natural Disaster Arrangements*.

The Guild would like to acknowledge those who have been affected by the 2019-20 bushfire season, especially those who tragically lost their homes, livelihoods and lives fighting these bushfires, including state and territory emergency service personnel. The Guild is committed to working with all governments, agencies, stakeholders and community groups through the provision of pharmacy services to work toward a swift recovery for those communities affected by this disaster and for future natural disasters that may arise.

The Guild is the national peak organisation representing community pharmacy in Australia. It strives to promote and support community pharmacies as the appropriate providers of primary frontline healthcare through the optimum therapeutic use of medicines, medicine management and other related services. Community pharmacies provide timely, convenient and affordable access to the quality and safe provision of medicines – most notably through the Pharmaceutical Benefits Scheme (PBS) – and other healthcare services by pharmacists who are highly skilled and qualified health professionals.

Community pharmacy is an essential and trusted part of Australia’s primary healthcare system. Each year there are 458 million patient visits¹ (approximately 8.8 million per week) to community pharmacies making pharmacists the most visited healthcare professional in Australia. The community pharmacy network, which represents over 5,700 community pharmacies, is one of Australia’s most accessible health networks, dispersed right across urban, regional and remote areas.

Pharmacists, as health professionals with expertise in medicine management, have the skills and knowledge that can significantly improve health outcomes and quality of life for individuals, especially for those managing chronic conditions and co-morbidities. The Guild recognises the importance of improving the health status of Australians and promotes the equitable access to medicines and pharmacy services to all Australians.

The Guild is committed to working with other healthcare professionals, stakeholders, community organisations, and all levels of Government in Australia to improve safe and quality healthcare services and health infrastructure that aim to support all Australians, including in times of crisis or disaster.

The 2019-20 bushfire season caused significant damage and disruption, and the health system was under increased strain. Pharmacists, as frontline health professionals, played a vital role in ensuring patients received the medication and advice they needed to get them through the crisis, often under stressful, trying and difficult conditions and circumstances. In order to help shape future national natural disaster planning, preparation, response and recovery efforts, we need to better utilise all the features of Australia’s health system, including pharmacists.

¹ PBS Date of Supply, Guild Digest, <http://www.abs.gov.au/ausstats/abs@.nsf/mf/3101.0>

Recommendations

1. Formal recognition of the need for pharmacists to be involved in disaster recovery and relief efforts, including planning, preparation and response;
2. The expansion of Continued Dispensing and complementary emergency supply arrangements to be made a permanent feature of Australia's health system;
3. A community pharmacist representative to be included in national natural disaster taskforces or commissions;
4. The immediate inclusion of a community pharmacist representative in future national disaster response and recovery working groups, and incident/emergency operations centres as required; and
5. The Pharmacy Guild of Australia to be a key professional organisation working with disaster planning agencies to assist community pharmacies and their communities.

PHARMACISTS DURING THE 2019-20 BUSHFIRE SEASON

The 2019-20 bushfire season had a devastating impact right across Australia. Homes, businesses and entire communities were decimated, and tens-of-thousands of Australians were affected or displaced from this natural disaster. Thick levels of smoke reached our capital cities, causing a range of health issues and reducing air quality to some of the world's worst. The most tragic feature of all was undoubtedly the loss of lives.

Amid this devastation, it was heartening to see the response from the broader Australian community – especially from those in our frontline health system continuing to offer their services and assistance during this emergency.

Community pharmacies played a critical role in the wake of these bushfires by continuing to stay open and offer pharmacist services to some of Australia's worst affected regions. There were many stories of pharmacists going above and beyond to support their patients, like the story of Andrew White.

Andrew White, a community pharmacist from Batehaven, worked beyond expectations to serve his local community. Despite a total loss of power to his pharmacy and with the assistance of torches provided by the police, Andrew and his staff worked tirelessly through the night to pack and personally deliver approximately 600 medication packs for people stranded in nursing homes, hospitals and evacuation centres on the following day. Andrew also set up a makeshift consultation booth outside his pharmacy, providing free medication and advice to around 90 evacuees, and worked with them to supply their usual medicines if they didn't have a script. Other pharmacists resorted to using sailing boats and jet skis to ensure patients cut off by the bushfires received their medicine.

These are just some of the many examples of how the community pharmacy network continued to provide frontline healthcare and services to patients and the community during the bushfire season, where healthcare services were often scarce. Pharmacists like Andrew White worked around the clock, co-ordinating with allied frontline health professionals, to provide urgent medical supplies and services to those in need.

Thousands of pharmacists across the country are uniquely placed to help with future disasters and emergencies. The Guild is calling for formal recognition of the frontline role that community pharmacists play during a crisis.

Recommendation:

- **Formal recognition of the need for community pharmacists to be involved in disaster recovery and relief efforts.**

MEDICINE SUPPLY IN EMERGENCIES

Community pharmacies play a critical role in ensuring continuity of medicine supply to consumers in emergencies, where consumers may have lost or do not have access to their medicines and/or prescriptions, may have lost or be unable to access relevant identification, may have limited or no access to their funds, and may also be attending an unfamiliar pharmacy which does not have their details on file.

As such, the Guild holds the following positions:

- Pharmacists have a duty of care to ensure consumers have access to essential medicines, including medicines requiring a prescription;
- Pharmacists should be appropriately recompensed for coordinating urgent medicine supply arrangements in emergencies, and this should be considered in any Commonwealth and State/Territory emergency management planning;
- Pharmacists can assist consumers by providing information on most efficient options for accessing essential medicines during an emergency situation; including any triggered natural disaster prescription provisions;
- Commonwealth and State/Territory legislation should facilitate consumer access to essential medicines from a pharmacy without excessive administration requirements for pharmacists and prescribers during an emergency management situation;
- Arrangements should be facilitated by Commonwealth agencies to expedite pharmacist access to relevant consumer information, including Medicare and Pension/Concession numbers and/or available medicine profile;
- The pharmacy should consider the types of arrangements it will have in place to support consumer access to prescription medicines where they have little or no access to personal funds. It is important to keep accurate records of supply of prescription medicines under these provisions.
- Preparations should be made for a pharmacy to access the medicines used in Opioid Dependence Treatment (ODT) and for consumers to access this service. Consideration needs to be given to take-away doses, recording and dosing, particularly when there is difficulty in contacting and confirming information with prescribers. In addition, issues surrounding temporary transfer patients who are unable to attend their usual dosing point, and the impact of the emergency on concomitant substance misuse should be considered and planned;
- Preparations should be made to provide alternative arrangements for Aged Care facilities receiving the pharmacy's services and to notify facility officials of these arrangements;
- In situations where pharmacists may have limited supplies of essential medicines, they should be authorised to use their professional judgement to ration supplies to consumers;
- Consumers must appreciate that in such emergency management situations, pharmacists may have to make professional judgements on which medicines are supplied as well as brands, strength and/or quantity available; and
- When the emergency has subsided, all efforts should be made to ensure prescribers have access to information regarding the emergency supply of medicines.

National Liquid Fuel Emergency

The Guild believes that pharmacists should be listed as essential personnel and high priority users for the preservation of health, safety and general welfare of the community in relevant legislation and procedures for the operational arrangements for the management of a national liquid fuel emergency. In this case, assistance would need to be provided to pharmacies to obtain fuel for the delivery of medicines:

- From community pharmacies to consumers who reside in residential facilities;
- To consumers who live at home but are not able to attend their local community pharmacy due to illness or disability;
- To community pharmacies from wholesalers and manufacturers to ensure that access to medicines is maintained.

CONTINUED DISPENSING

The disruption and displacement caused by the bushfires meant healthcare services, like GP clinics or hospitals, were under increased strain or cut off due to the emergency. It was reported there were more health complications, in particular people with asthma suffering from poor air quality, which meant health services were in increased demand.

In addition, people were urgently evacuating from their homes, often without medicines or prescriptions. In addition, emergency personnel who were brought in to fight the fires were staying for longer periods without having sufficient medicine or prescriptions for their ongoing needs.

During this time, pharmacies stepped in to play a critical role in ensuring patients continued to receive their prescription medicines under the expanded Continued Dispensing instrument announced by the Australian Government, and the complementary emergency supply measures implemented by the states and territories.

On 10 January, the Australian Government announced the temporary expansion of the Continued Dispensing arrangement² from 13 January until 31 March (subsequently extended to 30 June in the wake of the COVID-19 crisis³), whereby pharmacists could provide up to one month's supply of a patient's usual PBS medicine without a prescription, under strict conditions. These arrangements require the patient to have previously been prescribed a medicine with the pharmacist also needing to be satisfied it was urgently needed and safe and appropriate to dispense in the absence of a prescription.

The Guild welcomed the decision from the Australian Government and States and Territories to expand the Continued Dispensing and emergency supply arrangements during the disaster. It helped ensure those Australians affected by the bushfires continued to receive affordable access to their medicines in circumstances where they had no prescription, and little to no opportunity to access a prescriber in a timely fashion. This measure undoubtedly saved lives and prevented countless avoidable countless trips to hospital emergency departments at a time when affected people were under considerable duress.

However, the Guild notes the expansion of Continued Dispensing was implemented on 13 January, many weeks after the bushfires had begun. Whilst under state and territory laws pharmacists can provide a small supply (typically 3 days' worth) of prescription medicines in an emergency situation, in the early stages of the bushfire, where patient movement was restricted and access to GPs was unavailable, it is highly likely that patients were running out of medicines before they were able to access a prescriber.

² <https://www.health.gov.au/ministers/the-hon-greg-hunt-mp/media/ensuring-continued-access-to-affordable-pbs-medicines-for-those-impacted-by-bushfires>

³ <https://www.health.gov.au/ministers/the-hon-greg-hunt-mp/media/ensuring-continued-access-to-medicines-during-the-covid-19-pandemic>

If it hadn't been for the temporary expansion of the emergency supply provisions and of Continued Dispensing, we would have seen more trips to already stretched hospital emergency departments or more tragic circumstances.

Unlike prior disasters such as floods, cyclones and other bushfires where these expanded provisions were not in place, pharmacists have reported how useful and effective these provisions have been to help people affected by the 2019-20 bushfires.

The Guild is calling for the expansion of Continued Dispensing and complementary emergency supply arrangements to be permanently embedded in Australia's health system, with or without a disaster. This will ensure that when a future disaster hits, there is no delay in providing people with urgent access to their medicines. Maintaining this measure will deliver better health outcomes for patients, will help prevent avoidable hospital presentations, and in some situations, save lives.

In the UK it is standard protocol – with or without a declared emergency – for pharmacists to provide up to one month's supply for most prescription medicines if the pharmacist is satisfied the patient has previously been prescribed that medicine and in extraordinary circumstances cannot visit a prescriber.⁴

In Canada, every province has enabled pharmacists to renew and extend prescriptions for the continuity of care for most prescription medicines.⁵

Since the expansion of Continued Dispensing in January, pharmacists right across Australia have been safely providing emergency supplies of most prescription medicines to patients who have met the criteria. The Guild is unaware of any reported issues, abuse of the instrument or complaints, reflecting the ethical and legal compliance, professionalism and high level of training that pharmacists have.

Emergency situations occur in a range of communities around the country every year – including the current COVID-19 crisis. As the Australian Government is aware, experts and scientists have forewarned that bushfire emergencies could become a regular feature of Australian summers. Cyclones and flooding have also become a regular occurrence for authorities, governments and communities to deal with. It makes sense for this easily implementable measure to become a permanent feature within Australia's healthcare system. It will ensure Australians always have timely and adequate access to medicines in emergencies, leaving our hospitals and emergency healthcare services to care for the more acute and serious conditions arising from emergency and crisis situations. It will help to ensure Australia's health system and Australia's pharmacists are better equipped to manage a crisis when it hits and support their patients on the frontline.

Recommendation:

- **The expansion of the Continued Dispensing and complementary emergency supply arrangements should be a permanent feature of Australia's health system.**

⁴ NHS England. <https://www.nhs.uk/common-health-questions/medicines/where-can-i-get-an-emergency-supply-of-medicine/>

⁵ Canadian Pharmacists Association, Pharmacist's Expanded Scope of Practice: <https://www.pharmacists.ca/pharmacy-in-canada/scope-of-practice-canada/>

COMMUNITY PHARMACIST INCLUSION IN FUTURE NATIONAL NATURAL DISASTER RELIEF AND RECOVERY MANAGEMENT TASKFORCES

The Guild is calling for community pharmacists to be formally recognised and included in future national natural disaster arrangements in the areas of response, recovery, planning or preparation taskforces.

This means:

- Formal community pharmacist representation in federal and state or territory disaster preparation, planning and recovery plans; and
- Formal recognition of the critical role of pharmacists in providing expert medical advice, prescription medicines and other critical services during emergencies and disasters.

Pharmacists are the most accessed health professional in Australia and the community pharmacy network is one of the most equitable features of Australia's health system. Community pharmacies are often embedded in some of the most rural and remote locations where they have built relationships over many years with their patients. International evidence has demonstrated that when disasters hit, pharmacists were uniquely placed to help in recovery and relief efforts.⁶

Pharmacists have expert knowledge in medicines and medicines management, that under the right framework, can significantly improve health outcomes and quality of life for individuals during emergency and disaster.

To help prepare for future emergencies, community pharmacies can provide real-time information on the ground and in their communities to help key decision makers effectively plan responses. For example, community pharmacies can provide regular updates on medicine supply, logistical requirements including transport and storage of medicines, and availability and personal protective equipment shortages, which will help better prepare for a crisis before it occurs. Pharmacists can also provide this information during an emergency situation, so the medicine and equipment responses can be targeted at the communities that need them most.

It is wholly appropriate that community pharmacists are included in national natural disaster or emergency relief and recovery taskforces in the future.

The Guild should also be one of the key professional organisations working with disaster planning agencies to support community pharmacies and their communities in a disaster. One of the problems reported with the 2019-20 bushfires was when people presented to pharmacies without money, without access to ATMs and without EFTPOS operating due to power disruptions. This meant people could not pay for their medicines. Guild Branches in affected states immediately established urgent interim arrangements to allow member pharmacies to provide these essential medicines at no charge when patients had no ability to pay - the intent then being for the Guild to coordinate claims with relevant Governments.

Recommendations:

- **A community pharmacist representative to be included in national natural disaster taskforces or commissions;**
- **The inclusion of a community pharmacist representative in future national disaster response and recovery working groups.**

⁶ Defining pharmacists' roles in disasters: A Delphi study <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0227132>

- **The Pharmacy Guild of Australia to be a key professional organisation working with disaster planning agencies to assist community pharmacies and their communities.**

CONCLUSION

The 2019-20 bushfire season caused significant disruption and damage to hundreds of Australian communities, with long-term health, social and economic consequences.

Ensuring there is a primary health system fit for purpose during a time of disaster, crisis or emergency is what Australians expect and deserve.

Recognising the critical frontline role pharmacists play during disasters and emergencies and utilising their training to its full extent, including in recovery, relief and future planning efforts, will ensure that all Australian communities have the best access to essential medical services they need.

Providing pre-emptive and real-time information on medicine and personal protective equipment shortages to feed into planning processes and decision making at every stage of national emergencies such as bushfires.