



**The Pharmacy
Guild of Australia**
TAS Branch

Submission to the Inquiry into the Tasmanian Government's continuing response to the COVID-19 pandemic.

Contact: Monique Mackrill, Branch Director

Pharmacy Guild of Australia, Tasmanian Branch

ph: [REDACTED] email: [REDACTED]

The Pharmacy Guild of Australia, Tasmanian Branch (the Guild) welcomes the opportunity to provide a submission to the Inquiry into the Tasmanian Government's continuing response to the COVID-19 pandemic.

The Guild is a national employers' organisation with over 90 years of experience in representing and promoting the value of the role of community pharmacy in the Australian and Tasmanian health care systems. Community pharmacies are a vital part of the Tasmanian health system with the potential to make an even bigger contribution to the health of all Tasmanians. Pharmacies across Tasmania continue to play an important role in the current pandemic situation.

In Tasmania there are approximately 160 pharmacies located across the state, serving major regional centres as well as rural and remote communities. In Australia, pharmacies must be owned by registered practicing pharmacists, who invest in staff, services, infrastructure, and medications to help people manage health conditions.

By virtue of Commonwealth Government policy to ensure timely subsidised medication supply under the Pharmaceutical Benefits Scheme (PBS) community pharmacies, as approved agents of the PBS, ensure that there is equitable access to this cornerstone of Government Public Health Policy.

The Guild and its members across Tasmania recognise the role of the Tasmanian Government and the Tasmanian Department of Health in their leadership in responding to the pandemic. The Guild understands the many difficult decisions which needed to be made across multiple agencies to protect our local communities from an unknown quantum.

Our submission will focus on two areas outlined in the Terms of Reference (TOR), namely the reopening of the Tasmanian border and the COVID-19 vaccination uptake and rollout.

Reopening of the Tasmanian Border

On 17th March 2020, the Director of Public Health issued a *Public Health Emergency Declaration* for Tasmania to help manage the threat of the COVID-19 pandemic. Once this health emergency declaration was made, other emergency orders were announced. On 19th March 2020, the Tasmanian Government also declared a state of emergency for Tasmania.

A *Public Health Emergency Declaration* essentially delegates authority to the Director of Public Health who advises Government on decisions and actions to manage threats to public health. One such decision was to close Tasmania's borders for entry by the general population. This resulted in Tasmania enjoying very low rates of COVID-19 infection and virtually zero community transmission enabling Tasmanians to enjoy relative freedom when compared to other States experiencing lockdown.

Throughout the pandemic the Tasmanian Government held initially weekly and then fortnightly regular whole of sector updates which engaged clinical and administrative representatives including unions and peak bodies, from nursing, aged care, general practice, ambulance, public hospitals, rural health services and pharmacy. Meetings included the Health Minister, Secretary and Deputy Secretary of Health and Director of Public Health. These meetings provided an open forum where sector representatives could discuss current arrangements and impacts of upcoming announcements. We believe the discussions provided an acceptable conduit for Government to understand the issues experienced on the ground.

However, there were on occasions announcements made which took us by surprise, often compounded by being announced on Friday afternoons which resulted in the Guild having to scramble to get relevant information out to our Members on the likelihood of potential impacts to pharmacies.

We had instances where we had to ask for clarification on how pharmacists and pharmacy staff were classified in terms of essential workers as well as the definition of 'close' and 'casual' contacts for workforce isolation exemptions to enable pharmacies to stay open and continue to supply prescription medications. We also had to request clarification of the status of pharmacies as high-risk settings for the purpose of mask mandates.

This was frustrating as it appeared that pharmacies were not fully considered despite their vital role in continuing to provide prescription medication services and advice.

Significant impacts would have occurred if pharmacies were to close due to staff members falling ill. Pharmacies were not able to practice via telehealth and remained open and accessible to the public when many other healthcare providers were in fact unavailable for any type of face to face contact.

We recognise that at the pandemic onset the Government provided a one off \$10,000 grant to pharmacies to aid in helping pharmacies prepare as necessary and enable them to remain open. The grant funding was provided swiftly with minimal administrative requirements.

Up to date information provided by Public Health was essential to the Guild providing timely advice to aid our members in their decision making. Business Tasmania and Work Safe Tasmania were reliable sources of general information regarding work health and safety and how pharmacies were to implement COVID-19 Safety plans as required to protect their workers. Implementing work-safe plans in a 'high risk' environment was extremely time consuming and fraught with interpretation for many of our members.

Pharmacy owners struggled to keep up with the flow of information from various sources and immense workloads. The often-significant time lag between announcements made at the Commonwealth level and the advice from Public Health compounded this issue. An example of this is the changes to prescription delivery services through 'ePrescriptions' made at a Commonwealth level and the need for Tasmanian pharmacies to wait for the State to 'catch up' with providing advice under legislative instruments to ensure that they weren't breaking State laws. Pharmacies were reliant on General Practitioners to provide the correct and relevant prescription information which resulted in many pharmacies spending unremunerated time chasing up prescriptions as the legal order to ensure payment via the Pharmaceutical Benefits Scheme (PBS).

Rapid Antigen Tests

Prior to our borders opening in Tasmania we sought advice on matters including the use and sale of Rapid Antigen Tests in Tasmania, which were being used more widely across other jurisdictions- an excerpt of a letter received from Premier Gutwein on the 12th of December 2021¹:

"Currently, the use of RAT is only appropriate as part of an outbreak investigation where there is a high pre-test possibility (considering the wider epidemiological context) or to rapidly identify if COVID-19 may be the cause of a respiratory illness outbreak in a contained setting. Public Health advice is that there are limited benefits to be gained from the implementation of a RAT surveillance screening program in a low-prevalence community setting. While there is little to no community transmission, there is greater benefit to be gained from employers utilizing COVIDSafe work practices. This advice will be continuously reviewed as the situation in Tasmania changes."

Tasmania opened its borders on the 15th of December 2021 and community outbreaks ensued immediately. Shortly after in early January 2022, Tasmania, changed its position to recognise RATs for testing purposes. It was widely reported that the Tasmanian Government had stockpiled 500,000 RATs and had ordered two million more to be delivered around the 14th of January 2022, with another three million on order for delivery several weeks later, to be made available to symptomatic people and their close contacts at State managed drop off points at no charge².

Nationally, the Guild in conjunction with the Commonwealth, recognised the issues around equity of access and out of pocket costs associated with RATs and on the 24th of January 2022 the COVID-19 Rapid Test Concessional Access (CRTCA) Program was rolled out across all community pharmacies in Australia. In Tasmania this resulted in 160 Community Pharmacies (Guild and Non-Guild members) distributing RATs free of charge to concessional card holders.

Members in Tasmania were unable to access supplies of RATs through pharmacy wholesalers and anecdotal reports were received that the State had "commandeered" available stock through normal pharmacy supply channels leaving pharmacies scrambling to fulfill stock needs in the initial stages.

This extremely efficient Commonwealth program concluded on the 31st of July 2022. The Guild's Branches were encouraged to discuss with their State and Territory Governments a way to transition to a State/Territory model. The Tasmanian Branch reached out to the Health Department however we were informed that the access to RATs via the State would be handled through Service Tasmania.

¹ Gutwein, P 2021 Personal Communication

² Ainsworth, K 2022 'Free rapid antigen tests in Tasmania — here's where to get them and how to register a positive result'. Australian Broadcasting Commission Online <[Free rapid antigen tests in Tasmania — here's where to get them and how to register a positive result - ABC News](#)>

The Guild believes anecdotally that the State program has been inefficient in delivery and has resulted in many people simply not testing or reporting their COVID-19 positive status.

Service Tasmania store front locations simply do not provide the same level of local access across the State as community pharmacies did. This was compounded by Service Tasmania store fronts operating in standard public service hours, without access afterhours or on weekends.

While the State's program has similar parameters to the National program including concessional status, there is no way to verify the numbers supplied to individuals potentially leading to stockpiling of RATs. Additionally, community pharmacies have the benefit of months of operating as a high- risk setting, are experienced with infection control measures and the provision of general advice regarding testing and symptoms and were able to encourage opportunistic COVID-19 vaccination uptake across some 160 locations in Tasmania.

Continued Dispensing

The cessation of the instrument enabling pharmacies to provide one-month supply of a person's regular medication, known as 'Continued Dispensing,' under the PBS - now replaced with a less flexible arrangement - has been problematic for many pharmacies and patients. Commonwealth and State Governments have now wound back continued dispensing, which is unfortunate for the many people across Tasmania who have enormous difficulty accessing GP services. Often this means that they run out of their regular prescription medication while they wait to see a GP for a script. For many people not having access to their prescription medication is harmful to their health and wellbeing.

During the period that full Continued Dispensing was enabled, almost eighteen months, hundred of thousands of prescriptions across Australia were issued with no adverse health impacts. The State Government can under legislative amendments enable people to have access to their regular PBS medications, with the exceptions of Schedule 8 and Schedule 4D medications which may be subject to misuse or overuse. This is good public health policy, providing access and equity to healthcare, keeping people out of emergency departments. The Guild believes that Continued Dispensing should be restored and made permanent in Tasmania's legislation.

COVID-19 Vaccination Uptake and Rollout

At the time of preparing this submission over one hundred pharmacies across Tasmania have participated in the provision of COVID-19 vaccinations and some 250,000 vaccinations have been delivered since August 2021. The Guild is immensely proud of the work that all community pharmacies and pharmacists have played in the efficient and safe provision of vaccination services.

The Commonwealth announced that community pharmacies would be included in the delivery of COVID-19 vaccinations, providing pharmacy specific program guidelines detailing requirements for pharmacies to participate, including training, standards, administration, and payments. The State of Queensland was the first to add COVID-19 vaccines to pharmacists' scope and Queensland pharmacists started administering COVID-19 vaccinations in pharmacies in May 2021.

Other States soon followed yet Tasmanian pharmacists working in a community pharmacy setting had to wait until August 2021 before being authorised to administer the AstraZeneca vaccine - only to those aged sixty and over. Frustratingly, the Tasmanian Hospital Service advertised for pharmacist staff to work in state run clinics, placing yet more strain on the community pharmacy workforce. In September 2021 the Moderna vaccine was added to pharmacists' scope in Tasmania with vaccines delivered toward the end of the month through community pharmacies. Late in November 2021 the Pfizer vaccine was made available through pharmacy to encourage booster shots with the imminent opening of the borders. Novavax followed in February 2022 and finally in March 2022 children from 5-11 years could join the rest of the family to be vaccinated at the local pharmacy, with another level of approval required for the pharmacist and site.

Tasmania was last to announce community pharmacists involvement in all vaccination phases. In addition - unlike all other jurisdictions - the actual pharmacy site had to seek approval for each vaccine as did individual already approved pharmacist immunisers. This is despite pharmacists' AHPRA details and the administering pharmacy location being recorded on the Australian Immunisation Register (AIR) when the vaccine was administered.

In other jurisdictions orders were simply in line with ATAGI guidance. Once ATAGI had issued guidance, pharmacist immunisers like others were able to start vaccinating.

The wait and lag times unique to Tasmania caused pharmacies much stress when dealing with requests from the public who wanted a vaccine in their local accessible community pharmacy, without the hassle and wait of attending a large-scale public clinic.

The Guild cannot help but wonder why the Tasmanian government appears to relish over complicated and over-burdened processes compared to all other States.

Regarding children, pharmacies would have been ideally placed to supply vaccinations to the 5-11 years old cohort in the weeks before school started. Appointments could have coincided with parents receiving their vaccinations which would have been conducive to allaying younger children's fear of being vaccinated.

The Guild also suggested that pharmacy students (those doing their Bachelor of Pharmacy degree) working in community pharmacy could have assisted with vaccinations, specifically "drawing up" the vaccine under a registered pharmacist's supervision, as undertaken in other States, without success.

To aid with vaccination uptake the Guild believes that many paramedics could have been trained to administer COVID-19 vaccines and deployed into community pharmacies, working alongside pharmacists in approved pharmacy locations. Paramedics are highly skilled, used to working in a pressured environment and have skill in administering injectable medications. With adequate training this workforce would have been welcomed across many pharmacy locations.

With the approach of winter this year there was concern of a surge in influenza cases due to borders being open and many people not receiving the influenza vaccine the previous year, as well as low transmission and infection rates due to lockdowns. Pharmacies were urged to be well prepared and had ordered stocks in readiness for the uptake in the influenza vaccination services, so it was a surprise to us when the State set up state run influenza vaccination clinics, providing vaccinations at no cost.

Pharmacies had paid for their influenza stock and the State clinics effectively operated in direct competition with private enterprise. The Guild raised this and the option that pharmacies also provide free vaccinations with the State to reimburse. Soon across Australia, other jurisdictions set up programs that included community pharmacies to provide free influenza vaccination services, reimbursing participating pharmacies. Tasmania finally agreed to participate in a similar program at the start of June 2022.

The Guild runs an efficient and relatively simple program used by our member pharmacies providing vaccinations to participating organisations. The immunisation service is delivered and the Guild pays the participating pharmacy immediately, invoicing the participating organisation directly to cover the costs of the vaccinations provided. This system provides data including numbers administered and postcodes, and if the vaccine was a National Immunisation Program (NIP) supply. The vaccination record is automatically uploaded to the AIR as per Government requirements.

The Tasmanian Government chose not to take advantage of this system but instead asked that pharmacies record the numbers of vaccinations administered, totaled with the agreed amount to be paid by Government per vaccine, and send an invoice to their internal accounts Department. This led to many pharmacies waiting for payments and not easily able to reconcile payments.

We believe that the Government could have utilised the system that we had in place to manage payments for all participating pharmacies, where pharmacies would have been paid immediately for services rendered. We would have been able to provide very comprehensive data to the State to inform future programs.

We understand that the last few years have been difficult for many, and that governments have made decisions based on advice and information available to them from a wide range of sources. Our experience with the Tasmanian Government and the Health Department has for the most part been productive and positive. When needed we have been able to raise our concerns and highlight where we believe that deficiencies have occurred. The Guild makes no apologies in advocating for continued support and recognition of the community pharmacy sector in Tasmania.

Community pharmacy is integral to the health and wellbeing of Tasmanians and is an important part of primary care in this State, highlighted more so by the pandemic over the last couple of years. Health care access in all Australian jurisdictions is in crisis and community pharmacy and their pharmacists have the capacity, the skills and the willingness to play a bigger role; we need the support and will of the Government to remove outdated legislative controls to recognise this and act accordingly.