

5 September 2016

Professor King  
Pharmacy Review (MDP 900)  
Department of Health  
GPO Box 9848  
Canberra ACT 2601

Dear Professor King

**Submission to the Review of Pharmacy Remuneration and Regulation**

- **Metformin Extended Release (XR) shortages**

I would like bring to the attention of the Review Panel an ongoing problem in community pharmacy with respect to the shortage in supply of medicines to the Australian community. I have noted in the Discussion Paper that despite the many topics covered, medicines shortages was not one covered. Whilst I believe that (in relation to question 76) Section 100 and RPBS should be included in the Community Service Obligation and that as a condition of PBS listing medicines should be available through a CSO wholesaler of a pharmacy's choice (in relation to question 75) I believe that the Department of Health (both the Therapeutic Goods Administration and the Pharmaceutical Benefits Division) needs to take a greater role in the shortages of medicines.

Metformin is a medicine used for the treatment of patients living with Type II diabetes and whilst there are other formulations available if a patient is stabilised on a certain formulation this is what they and their doctor expect to have dispensed when they visit a pharmacy.

I, like many other pharmacists across Australia, have contacted the Therapeutic Goods Administration (TGA) in regards to the shortage of the Metformin XR formulations. I was initially told that supply of some brands was available, despite confirming with all manufacturers that this was not the case and that supply was not expected for many weeks.

Metformin is not a "low usage" medication like previous medications in short supply, in fact the contrary. Many of our patients have already run out. Apart from the obvious inconvenience, this technically leaves the consumers with no option but to return to their doctors to have them change them over to either the "immediate release" metformin formulation or another medication. This no doubt results in a huge burden on the Medicare system, increasing unnecessary doctor's visits and charges to Medicare.

Like many others in the pharmacy workforce, as a consumer myself and on behalf of my many disgruntled customers, I feel that much more needs to be done to prevent such situations from occurring. I believe that the TGA and the Pharmaceutical Benefits Division needs to have a "closer" finger on the pulse. Put simply, it results in a massive workload for everyone involved, doctors, pharmacists and most significantly the consumers whose health is at risk. The amount of wasted time required of the pharmacist is astronomical and is goes completely unrewarded! With such scenarios, it is unsurprising why many pharmacists are feeling dissatisfied with their jobs.

Review of Pharmacy Remuneration and Regulation  
Submission #46; 8-Sep-2016; Greg Kossena

Most importantly, such situations can be simply addressed by the pharmacist (such as a change in formulation in this case, XR to IR metformin). This is an extremely powerful example of why pharmacists should have an influence on prescribing. Legislation needs to be changed to allow pharmacists to make the appropriate prescribing changes to prevent such a ridiculous, unnecessary expense and burden on our already stressed health system.

I believe that issue of metformin and other medicines shortages needs to be included in the Review of Pharmacy Remuneration and Regulation and I look forward to the topic being included in your draft report.

Yours sincerely,

Greg Kossena  
BPharm, BPharm Sci (*Hons*), PhD (*Monash*) MPS

Cowes Pharmacy (Priceline Pharmacy Cowes)  
24 Thompson Ave  
Cowes Victoria 3922

...