



7 July 2014

Keir Delaney
Secretary
Standing Committee on Legal and Social Issues
Parliament House
Spring St
East Melbourne Victoria 3002

Dear Mr Delaney

Inquiry into community pharmacy in Victoria

Thank you for the opportunity to provide evidence to the Parliamentary Inquiry into community pharmacy.

During the inquiry a question was raised in relation to legislative and regulatory barriers to pharmacists carrying out vaccination in Victoria.

It is our view that that the current legislative framework is a major barrier to pharmacists carrying out vaccination in Victoria.

Our understanding is that the Victorian *Drugs Poisons and Controlled Substances Act 1981* (the Act) sets out the persons who are authorised to obtain, possess, use, sell or supply poisons or controlled substances that are listed in Schedules 1 to 9 under the Act. Regulation 5 of the *Drugs, Poisons and Controlled Substances Regulations 2006* sets out the persons who are authorised to possess Schedule 4, 8 or 9 poisons and specifies the extent of possession permitted.

Under the Act, medical practitioners, pharmacists and dentists have a general authorisation to 'obtain, possess, use, sell or supply' all substances listed in Schedules 2 to 9. This authorises medical practitioners and dentists to prescribe medicines to their patients and pharmacists to dispense medicines.

The Act does not clearly address the issue of administration of vaccination by a pharmacist.

The current practice in Victoria is that an influenza vaccine is only supplied by a pharmacist when presented with a prescription duly written by a medical practitioner or another authorised prescriber.

The *Northern Territory Medicines, Poisons and Therapeutic Goods Act* was recently amended to allow a qualified pharmacist to supply and administer a Schedule 4 vaccine.

It is therefore our recommendation that the Victorian Act be amended to include a provision that allows pharmacist to supply and administer a Schedule 4 vaccine.

Victoria

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We would like to emphasise that we are not seeking to replace existing arrangements by nurse immunisers under the National Immunisation Program. The aim of a pharmacist administered vaccination would be to provide access to consumers that do not meet criteria of the National Immunisation program.

Furthermore, please find enclosed is the transcript of evidence with my corrections as requested.

I trust that this information is helpful and is based on our understanding of the existing legislation.

Should you require more information, please do not hesitate to contact our Professional Services Manager Stan Goma

Yours sincerely

Anthony Tassone
President, Pharmacy Guild of Australia (Victoria Branch)

