



21 JUL 2014

18th July 2014

The Hon Jack Snelling
Minister for Health
Minister for Mental Health and Substance Abuse
Unit 1/3 Wilkinson Road
PARA HILLS SA 5096

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Re: Future of Pharmacy Regulation Authority South Australia (PRASA)

Dear Mr Snelling,

I am writing to inform you of the Pharmacy Guild of Aust (SA) (Guild) position on the recent announcement by the Premier to abolish the Pharmacy Regulation Authority SA (PRASA) and perhaps as an alternative subsume the operations of PRASA into SA Health.

The Guild, and its members fully support the purposes for which PRASA was established, that being to act in the public interest in the registration and policing of the state's regulations and standards around the premises from which a pharmacy can operate. This also allows for the policing of the individual and corporate owners (pharmacy services providers) of the pharmacy business.

Over many years it has been widely recognised by governments of all persuasions that the public is best served by a model of community pharmacy in which the control of the business remains in the hands of the pharmacists. PRASA plays a very strong role in making sure that the legal entities involved in the ownership structures allowable under the Act are not infringed in ways that would weaken the very strong public protections your and previous governments put in place.

Likewise PRASA plays a key role in making sure that the premises from which pharmacy is practised meet the legislative requirements of the Act and remain fit for purpose, ensuring safe and secure access to appropriately registered and equipped pharmacies and the medicines maintained on those premises. The possible diminution of oversight in this area could have a significant impact in terms of community safety.

Your government has repeatedly made strong public statements about ensuring ownership of the profession stays in the hands of those directly responsible to the public as well as ensuring that pharmacies don't locate within inappropriate premises such as supermarkets.

The Guild is of the opinion that abolishing PRASA and establishing an alternative method of operation (from within SA Health for example) may well see a decreased emphasis on these key public protectors with 'desk-top audits' rather than site visits and forensic analysis of ownership structures as occurs now.

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While any slippage of standards might be gradual it is important that this does not happen. Prior to your tenure, for example, the previous Health Minister called upon the profession to help distribute anti-viral medications during an influenza outbreak. This required urgently finding pharmacies that met a number of strict physical criteria as to location and entry/exit points amongst other things to prevent infected individuals coming into contact with the public.

This type of rapid response to public emergencies goes to the very heart of the public good that is supported by your government's sensible approach to premises registration and ownership restrictions. PRASA plays a vital role in ensuring the integrity of pharmacy network in this state. It is an asset that should be maintained to the highest possible level in terms of both physical and professional standards.

You would realise, of course, that PRASA is funded completely through fees raised from the profession and as such, in its present form, is not a drain on the state's finances. In fact the current regime allows PRASA to complete some tasks on behalf of other state agencies. For example aspects of the state's poisons legislation as they relate to the safe handling and storage of Schedule 8 narcotics are routinely policed by PRASA on their site visits. Likewise the enforcing of things like the real time reporting of pseudoephedrine sales to the Drugs of Dependence Unit and SA Police through Project Stop, are also undertaken during these visits.

Despite the expense to our businesses, the pharmacists of the state fully support the maintenance of PRASA in its current form. The Guild does not believe that it is appropriate to raise considerable fees from the profession for these vital public services on the one hand and to then reduce the service that we pay for on the other.

I would very much appreciate an urgent meeting with you to discuss this further.

Yours sincerely,



Ian Todd BPharm MBA

Branch President

c.c. The Hon Jay Weatherill Premier

PREM14D03684



Hon Jay Weatherill MP
Premier of South Australia

Mr Ian Todd
Branch President
The Pharmacy Guild of Australia (SA)
233-235 Greenhill Road
DULWICH SA 5065

Dear Mr Todd

The Hon Jay Weatherill MP, Premier of South Australia has asked me to thank you for sending him a copy of your letter of 18 July 2014 to the Minister for Health, the Hon Jack Snelling MP, about the future of the Pharmacy Regulation Authority South Australia (PRASA).

The Premier appreciates receiving a copy of your correspondence.

Yours sincerely

A handwritten signature in black ink, appearing to read "Jay Weatherill", written in a cursive style.

**Premier's Correspondence Unit
Office of the Premier**

21 July 2014