

18 March 2024

Department of Health and Aged Care
Therapeutic Goods Administration
PO Box 100
Woden ACT 2606

Via email: shortages.strategy@health.gov.au

Dear Shortages Strategy secretariat,

Re: Medicine shortages in Australia – Challenges and opportunities

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide feedback on the Medicine shortages in Australia – Challenges and opportunities consultation.

General practitioners (GPs) are the first point of contact for most Australians seeking healthcare, with almost nine in 10 Australians visit a GP at least once each year.¹ GPs prescribed the most Pharmaceutical Benefit Scheme (PBS) and Repatriation Pharmaceutical Benefit Scheme (RPBS) medicines in Australia, accounting for approximately 87% of all prescriptions dispensed.² While GPs play an important role in prescribing and administering medications, they also educate and counsel their patients regarding medication usage, undertake medication reviews, and deprescribe where necessary.

Medication shortages impact patient care and safety. Ensuring minimum supply is available is particularly important for critical needs medication, and for medications with no alternatives for the same indication. The RACGP recommends mechanisms and/or mandates be put into place to ensure a minimum supply of medication is always available in Australia to more effectively meet demand.

Responding to medicine shortages and discontinuations

GPs will discuss supply issues with patients. GPs should generally prescribe the best option for the patient, regardless of any medication shortages. Pharmacists can often source supplies and, where necessary, speak to the GP about giving the patient alternative prescriptions.

Communicating about medicine shortages and discontinuations

It would be beneficial for the TGA to identify medicine shortages and substitutions provisions that will impact general practice and have a proactive process of alerting GPs to expect disruption. This ensures GPs have the most up to date information to prescribe medications to their patient. The RACGP can assist with disseminating information but other channels should also be considered, such as through GP software (see response below).

Incorporation of shortage notifications in GP clinical information systems

It would be helpful for the TGA warnings about shortages to be integrated into general practice clinical information systems. While this is currently not technically possible, there is ongoing work being conducted to make GP clinical information systems compatible with Fast Health Interoperability Resources (FHIR) standards and Smart App functionality. Once healthcare information exchange between different computer systems is established, (via FHIR standards) then an interface between TGA warnings and GP prescribing software would be technically feasible.

Thank you again for the opportunity to provide feedback on the Medicine shortages in Australia – Challenges and opportunities consultation. For any enquiries regarding this letter, please contact Stephan Groombridge, National Manager, Practice management, Standards and Quality Care on 03 8699 0544 or stephan.groombridge@racgp.org.au.

Yours sincerely



Dr Nicole Higgins
RACGP President

References

1. The Royal Australian College of General Practitioners. General Practice Health of the Nation 2023. East Melbourne: RACGP, 2023.
2. Australian Institute of Health and Welfare. Medicines in the health system. Canberra: AIHW, 2022.