



CORPORATE OFFICE

Level 2
32 Oxford Terrace
Christchurch Central
CHRISTCHURCH 8011

Telephone: 0064 3 364 4134
Kathleen.Smithram@cdhb.health.nz

27 June 2022

9(2)(a)

RE Official Information Act request CDHB 10868 & WCDHB 9697

I refer to your email dated 6 May 2022 requesting the following information under the Official Information Act 1982 from the Canterbury DHB and West Coast DHB. Specifically:

1. **Any policy document the DHB has in place addressing the risk that an Integrated Pharmacy Services Agreement (ICPSA¹) is granted to a pharmacy in which medicines are co-located (ie, offered for sale within the same physical premises) as alcohol, cigarettes.**

Neither DHB holds such a policy document. However, the ICPSA refers to various professional and service obligations on pharmacists and pharmacies, in particular to comply with Pharmacy Services Standards and the Code of Ethics (refer clause B.5).

2. **To the extent your DHB has such a policy document, documents recording any discussion about the potential issues raised by co-location of pharmacies and alcohol and/or cigarettes during the development of the DHB's pharmacy contracting policy.**

Not relevant – see previous response.

3. **Any documents showing that the DHB and its personnel took into account and/or addressed the fact that alcohol and/or cigarettes are available for sale within the same premises as a pharmacy when considering the application for an ICPSA by a Countdown Pharmacy. This request is limited to ICPSA applications submitted to the DHB by a Countdown Pharmacy after 1 May 2020.**

Neither DHB holds such a document. We note however that:

- a. Countdown holds a pharmacy licence granted by Medsafe for the premises of each in-store pharmacy which, we understand, relates to the immediate floor area of the pharmacy rather than the whole store,
- b. Countdown supermarkets with an in-store pharmacy generally display alcohol and cigarettes at a significant distance from the pharmacy, and
- c. it is not uncommon for other pharmacies to be located next door or very close to a dairy selling cigarettes or a liquor outlet (see examples attached as **Appendix 1**).

¹ Generic copy of an ICPSA available at <https://tas.health.nz/dhb-programmes-and-contracts/community-pharmacy-programme/icpsa/>.

- 4. Any policy document the DHB has in place to monitor the operation of an ICPSA (or, if no such specific policy exists, any policy document the DHB has in place to monitor the operation of service agreements it has entered into pursuant to section 25 of the New Zealand Public Health and Disability Act 2000).**

Neither DHB holds such a policy document. However, in practice we closely monitor the operation of contracted pharmacies in various ways. For example, through:

- a. reviewing regular reports from TAS on pharmacy service patterns and patient population,
- b. reviewing reports from Medsafe on pharmacy quality audits, and
- c. addressing complaints about pharmacies received the general public, other pharmacies, or referrers.

- 5. Any policy document the DHB has in place addressing how it should respond to a failure to comply with the terms of an ICPSA (or, if no such specific policy exists, any policy document the DHB has in place to address a failure to comply with a service agreement it has entered into pursuant to section 25 of the New Zealand Public Health and Disability Act 2000).**

Neither DHB holds such a policy document. However, we have occasionally identified cases where a pharmacy has failed to comply with a material obligation of its service agreement with the DHB. The formal procedure for addressing such cases is set out in ICPSA clauses C.29 to C.37. Where the pharmacy disputes the failure the procedure for resolution is set out in ICPSA clauses C.19 – C.24.

- 6. Documents recording the DHB's response to any failure by a pharmacy to comply with the terms of its ICPSA. This request is limited to failures since 1 January 2021.**

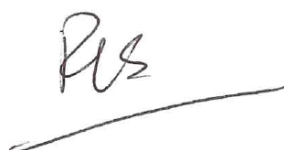
Since January 2021 there has been no cases where we have become aware of a pharmacy failing to perform a material obligation under its ICPSA.

From time to time pharmacy service issues come to our attention that are potentially of concern, but which do not constitute a failure to perform a material obligation. We address and clarify these issues directly with the pharmacy or pharmacies concerned, and we are pleased to note these are generally resolved satisfactorily without the need for us to respond formally. Since January 2021 there has been no case of a pharmacy failing to comply with its ICPSA which have necessitated us responding formally.

I trust that this satisfies your interest in this matter.

Please note that this response, or an edited version of this response, may be published on the Canterbury DHB website and West Coast DHB website after your receipt of this response.

Yours sincerely



Ralph La Salle
Senior Manager, OIAs
Canterbury DHB & West Coast DHB

Examples of pharmacies located very close to outlets selling cigarettes or alcohol

Redwood Pharmacy, Redwood, Christchurch



Ilam Pharmacy, Ilam, Christchurch



St Albans Pharmacy, St Albans, Christchurch



Unichem Clive's Pharmacy, Wainuiomata

