

18 March 2020

Medicines Classification Committee Secretary  
By email: [committees@health.govt.nz](mailto:committees@health.govt.nz)

### **Agenda for the 64<sup>th</sup> meeting of the Medicines Classification Committee**

Dear Sir/Madam

The New Zealand Medical Association (NZMA) wishes to provide comment to the Medicines Classification Committee (MCC) regarding item 6.1 (Human Papillomavirus (HPV) vaccine) on the agenda for the 64<sup>th</sup> meeting scheduled for 14 May 2020. We note this item relates to an application for the reclassification of the HPV vaccine to allow pharmacists with approved training to provide this vaccine without a prescription.

While we are not opposed to the proposed reclassification of HPV per se, and support measures to increase the uptake of HPV vaccine, we are concerned by some of the claimed benefits that are being touted to support the reclassification. In particular, as a claimed benefit to the health system, the application identifies pharmacies being able to help out with vaccine stock where a General Practice has run out, with influenza vaccine as an example of where this has occurred.

Vaccine supply issues have been a major concern for General Practice twice over the past year—for MMR during last year's Auckland outbreak, and for the 2019 flu season. We question the extent to which flu vaccination by pharmacies contributed to the interruption of flu vaccine supply to General Practice. Many patients at higher risk of complications and hospitalisation missed out on their flu vaccination last year due to stock and supply issues while fit and well individuals were able to present directly to a pharmacy to pay for, and receive, flu vaccination. It is difficult to accept that this represents a benefit to the health system. We ask the Committee to consider at what point vaccine supply to pharmacies compromises supply to General Practice, and how this gets resolved.

Yours sincerely



Dr Kate Baddock  
NZMA Chair