Swisse Wellness

Submission to the Review of Pharmacy Remuneration and Regulation

September 2016

KEY RESPONSES:

- Swisse strongly contends that Complementary Medicines should remain for sale in community pharmacy given the focus on improving consumer choices in health care;
- There is no case for the removal of listed complementary products from the pharmacy environment given the low risk, the robust regulatory framework that governs the industry and the significant level of scientific development and testing by industry.
- Australia’s therapeutic goods regulations and ACCC/ACL provision enable consideration and adjudication on non-compliance through well-established legal and competition mechanisms that strengthen consumer protection.
- Removing complementary medicines from pharmacies based on unproven claims about consumer protection would greatly undermine consumer choice and freedom to trades.
EXECUTIVE SUMMARY

Swisse Wellness is a Melbourne based global leader in nutraceuticals, including vitamins, herbal and mineral supplements which has recently expanded into sports nutrition, natural skincare and functional foods. We have a strong market presence across Australia, the Asia Pacific, China and Europe and sell Australian-made products of the highest quality, safety and efficacy.

Swisse welcomes the opportunity to submit responses to this review on behalf of millions of Australians who regularly use Complementary Medicines.

Australia’s complementary medicines industry is already recognised as being regulated to the highest global standards. Yet there is still room to strengthen public health outcomes even further if government, the health sector and professionals agree to promote consumer choice in health care.

We hold the view that the strongest public health outcomes are best supported through consumer choice. Government health policy reflects this, and supports preventative approaches to health care, with pharmacists and other allied health professionals playing a significant role in delivering cost-effective health outcomes.

There is no case for the removal of listed complementary products from the pharmacy environment given the low risk nature of complementary medicines, the robust regulatory framework that governs the industry and the significant level of scientific development and testing by industry.

The removal of complementary medicines from pharmacies would be irresponsible given the benefit to consumers of the advice and explanation provided by pharmacists in relation to the benefits and ingredient qualities of complementary medicines.

Any recommendations from this inquiry must be based on consumer interests especially choice, positive health outcomes and the longstanding policy of freedom to trade.

Australia’s therapeutic goods regulations enable consideration and adjudication on negligent practice through well-established legal and competition mechanisms that strengthen consumer protection.

Removing complementary medicines from pharmacies based on spurious claims about consumer protection would greatly undermine consumer choice and freedom to trade.
26. SHOULDN'T RETAIL PRODUCTS BE LIMITED IN COMMUNITY PHARMACIES? FOR EXAMPLE, IS IT CONFUSING FOR PATIENTS IF NON-EVIDENCE BASED THERAPIES ARE SOLD ALONGSIDE PRESCRIPTION MEDICINES?

Australia’s regulatory framework governing listed and registered products minimises the risk of non-compliant and unsafe therapeutic goods being listed on the Australian Register of Therapeutic Goods and subsequently brought to market.

Restricting the sale of complementary medicines and other listed products will deter active involvement in individual health plans by preventing consumers from purchasing their preferred therapeutic goods at their chosen outlet.

It is wrong to claim that the effectiveness of complementary medicines is not supported by scientific evidence. Many complementary medicines have a very strong basis in scientific evidence, with commonly-used products like multivitamins, vitamin D and fish oils being amongst the most studied therapeutic goods (refer to graphic below).

Australians also need to help themselves, with 70% of the population not meeting recommended daily fruit and vegetable intake recommendations. Meanwhile, there’s a substantial body of evidence supporting the complementary health industry, including an article from Harvard concluding that a daily multivitamin is good for your nutrition1.

Bogus claims by a small minority of individuals that complementary medicines are unsupported by traditional medical research, ignores the wide array of robust and independent peer-reviewed literature on complementary medicines.

Complementary medicines should be sold in pharmacies given the value to consumers of educated advice on claims, benefits and ingredient uses.

We support Therapeutic Goods Australia considering alternative pathways to promote scrutiny of efficacy and evidence claims through the creation of a new listing stream (as discussed in the Sansom Review of Regulation of Medicines and Medical Devices).

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27. **WOULD A COMMUNITY PHARMACY THAT IS SOLELY FOCUSED ON DISPENSING PROVIDE AND APPROPRIATE OR BETTER HEALTH ENVIRONMENT FOR CONSUMERS THAN CURRENT COMMUNITY PHARMACIES? WOULD SUCH A PHARMACY BE ATTRACTIVE TO THE PUBLIC? WOULD SUCH A PHARMACY BE VIABLE?**

This proposed approach neglects the increasingly important role of community pharmacies in disease management, health prevention and general care and wellbeing.

Complementary medicines play a major role in the achievement of preventative health objectives. The demand for complementary medicines is clear evidence of their usefulness and benefits for our consumers. Pharmacies are often the first point of contact in the health network, which requires them to offer a diverse range of therapeutic goods to prevent common illnesses, promote wellbeing and assist in the treatment of existing conditions.

Consumers expect community pharmacies to offer products which provide some level of therapeutic benefit, and appreciate the ability to purchase these products in consultation with appropriately qualified staff. The creation of a tiered pharmacy network would create unnecessary cost, location and supply barriers to consumers wishing to access alternative therapies as part of their individual health plan.

115. **DOES THE AVAILABILITY AND PROMOTION OF VITAMINS AND COMPLEMENTARY MEDICINES IN PHARMACIES INFLUENCE CONSUMER BUYING HABITS?**

Australian consumers possess a high degree of health literacy and are well-educated on matters concerning their own health care. Consumer buying patterns indicate that complementary medicines are an important element in the individual health care of educated and aware consumers.

Consumer buying habits are based on their decisions about the health and wellbeing benefits of purchasing and consuming complementary medicines. Consumers are motivated to purchase a complementary medicine as part of their desire to take control of their health. In-pharmacy promotion is secondary to the advice consumers receive from community pharmacy professionals who, through their training in pathophysiology and pharmacology, are able to interpret claims, therapeutic benefits, interactions and product composition.

116. **SHOULD COMPLEMENTARY PRODUCTS BE AVAILABLE AT COMMUNITY PHARMACIES, OR DOES THIS CREATE A CONFLICT OF INTEREST FOR PHARMACISTS AND UNDERMINE HEALTH CARE?**

Complementary medicines should be available at community pharmacies. As their name denotes, complementary medicines are one element of an individual health plan and may be taken in addition to other lifestyle interventions, nutrition and other medicines given their safety, quality, efficacy and therapeutic benefit.

A pharmacist’s role as a primary source of advice and health support includes the responsibility of offering and advising consumers on the use of complementary medicines.
Selling complementary medicines in pharmacies minimises consumer health risk by providing access to informed professionals who can give advice on contraindications and other sensitivities.

117. **DO CONSUMERS APPRECIATE THE CONVENIENCE OF HAVING THE AVAILABILITY OF VITAMINS AND COMPLEMENTARY MEDICINES IN ONE LOCATION? DO CONSUMERS BENEFIT FROM THE ADVICE PROVIDED BY PHARMACISTS WHEN SELLING COMPLEMENTARY MEDICINES?**

The answer to both questions is yes. Community pharmacists make a strong and growing contribution to improving consumer health literacy and improving public health outcomes.

Pharmacists are able to use their expertise and training to offer a number of services that were once only available through general practitioners, providing substantial savings and benefits to both consumers and government.

Pharmacists are able to provide advice on how to incorporate complementary medicines into a consumer's overall health and lifestyle approach.

Complementary medicines assist consumers with the prevention of certain illnesses and are also recognised as an adjunct to other treatments.

Pharmacists have a fundamental role in ensuring consumers have access to safe and effective therapeutic goods.

Access to this level of advice and high-quality products is only assured within pharmacies, so removing these products from pharmacies greatly restricts access to the best available information for consumers on evidence, usage and suitability. With a goal of supporting consumer literacy on the quality, safety and effectiveness of any complementary medicines, it would appear counter-productive and counter-intuitive to remove them from the pharmacy environment where scientifically trained experts are on hand to assist consumers in making good choices.

118. **DOES THE ‘RETAIL ENVIRONMENT’ WITHIN WHICH COMMUNITY PHARMACY OPERATES DETRACT FROM HEALTH CARE OBJECTIVES?**

No. Community pharmacy’s continuously expanding beneficial involvement in holistic healthcare is occurring in a retail environment, so it is clearly wrong to claim that health care objectives are somehow undermined in this context.

Community pharmacy’s continuing growth and viability amidst burgeoning consumer interest in integrative and preventative approaches to health care should be supported by appropriate regulation which enshrines freedom to trade and consumer choice.

The growing burden of chronic disease and an increased focus on preventative health have influenced consumer demand and altered consumer expectations of the broader health sector.

Community pharmacy must adapt and grow beyond the traditional function to dispense medicines and continue to meet consumer demand by providing information, advice and products which support improved health and wellness outcomes.