



11 July 2018

Committee Secretary
HCDSDFVPC
PARLIAMENT HOUSE QLD 4000

pharmacy@parliament.qld.gov.au

Dear Committee Secretary

Diabetes Queensland welcomes the Committee's inquiry into the establishment of a pharmacy council and transfer of pharmacy ownership in Queensland, and is pleased to provide the following contribution.

Diabetes Queensland is aware of the rapidly changing nature of pharmacy ownership in Australia, with the dominance of chain retail pharmacies and the emergence of online pharmacies.

With one retail group holding nearly 30 per cent of the market, and Independent pharmacies accounting for a diminishing proportion of 12 per cent of the market (IBISWORLD), the model of the community pharmacy is unrecognisable from in previous decades.

While that may afford benefits, it also comes at a cost. In the CanStar Blue satisfaction ratings for pharmacy chains (<https://www.canstarblue.com.au/stores-services/pharmacies/>), there were a couple of concerning trends. Only one of the nine chains achieved the five star rating in either category for 'pharmacist availability' and 'availability and dispensing of prescriptions'. One chain scored three stars in both categories.

These both indicate a more remote relationship between the pharmacist and the consumer, which is not the ideal circumstance for a person living with diabetes. Diabetes Queensland would like to see a model in which a pharmacist, and their ability to establish relationships and dispense advice, was central to the pharmacy.

The difficulties created by the current trends in retail pharmacy are highlighted by a recent case that shows the importance of retaining a patient-focus within pharmacies: the shortage of Keto test strips. Urine and blood testing keto strips are a device for measuring a person's level of ketones.



In the case of a person living with diabetes, usually type 1, using keto strips to monitor levels can avoid the state of diabetic ketoacidosis (DKA). DKA is a life-threatening condition caused by low levels of insulin, which results in escalated levels of ketones. This can occur in a matter of hours, and it requires immediate medical attention.

However, there have been reports, as documented in the media (<http://www.abc.net.au/news/2018-07-02/ketogenic-dieters-robbing-diabetics-of-life-saving-tests/9927608>) and by members of Diabetes Queensland of difficulties in obtaining strips from pharmacies. Some members have reported driving between multiple pharmacies to obtain these strips for themselves or their children, because of short supply. The impact of these shortages can be seen in a Facebook conversation on Diabetes Queensland's page - <https://www.facebook.com/DiabetesQueensland/posts/1849644951740359>

The current situation seems attributable to a dietary use for the strips, with the keto diet, which encourages ketosis or burning fat instead of carbohydrate to achieve weight loss. People following this diet are becoming significant consumers of keto strips, in competition with people who need them to manage their diabetes.

It is the firmly held view of Diabetes Queensland that pharmaceutical goods that have both a medical and other purpose should have the medical use prioritised. Diabetes Queensland would like to see a requirement that at least some stock of a dual-use product be retained for its medical use only. In the case of keto strips, this would be to prioritise its potentially life-saving use ahead of its dieting use. This Inquiry offers a good opportunity to ensure regulations governing ownership keep the interests of Queenslanders requiring pharmaceutical supplies central to the conversation.

Diabetes Queensland has had a long history of interactions with the pharmacy sector, both through their position as access points for the distribution of National Diabetes Support Scheme (NDSS) products.

Yours sincerely,



Michelle Trute, CEO
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