

10 April 2025

Mr Chris Steel MLA  
ACT Treasurer  
GPO Box 1020  
Canberra ACT 2601

Email: [budgetconsultation@act.gov.au](mailto:budgetconsultation@act.gov.au)

Dear Treasurer,

The Pharmaceutical Society of Australia (PSA) thanks you for the opportunity to provide a submission through the 2025-26 Australian Capital Territory (ACT) Government Budget consultation process.

As medicine safety experts and one of our most accessible frontline health workforces, pharmacists can and should play a greater role in improving access to medicines and health care for the Australian population and individual patients to improve the health of all Australians.

In this submission, PSA makes two recommendations to directly improve the health and safety of Canberrans, supported by investment in the 2025-26 ACT budget.

1. Improve patient access to vaccines for preventable diseases by expanding the range of vaccines that can be administered by pharmacist immunisers in the ACT.
2. Improve access to primary care for Canberrans by expanding pharmacist prescribing.

These recommendations give Canberrans greater access to care when and where they need it. I welcome the opportunity to discuss these proposals further.

Sincerely,



**Olivia Collenette**  
ACT Branch President  
Pharmaceutical Society of Australia

## About PSA

PSA is the only peak national professional pharmacy organisation representing Australia's 40,000 pharmacists working in all sectors and across all locations.

PSA is committed to supporting pharmacists to help Australians access quality, safe, equitable, efficient and effective health care. PSA believes the expertise of pharmacists can be better utilised to address the healthcare needs of all Australians.

PSA works to identify, unlock, and advance opportunities for pharmacists to realise their full potential, to be appropriately recognised and remunerated.

PSA has a strong and engaged membership base that provides high-quality health care and are the custodians for safe and effective medicine use for the Australian community.

PSA leads and supports innovative and evidence-based healthcare service delivery by pharmacists. PSA provides high-quality practitioner development and practice support to pharmacists and is the custodian of the professional practice standards and guidelines to ensure quality and integrity in the practice of pharmacy.

**In the ACT, there are 785 registered pharmacists working in community pharmacy, hospital, general practice, aged care, Aboriginal health services, government, the military and within other private sector organisations.**

## RECOMMENDATION 1

### **Improve patient access to vaccines for preventable diseases by expanding the range of vaccines that can be administered by pharmacist immunisers in the ACT**

*PSA recommends that the ACT Government makes the regulatory changes necessary to provide ACT pharmacist immunisers with the ability to initiate and administer all privately-funded and National Immunisation Program (NIP)-subsidised vaccines. This will increase patient options and access to vaccinations, reduce wait times and costs to patients.*

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#### ***The challenge***

Immunisation is one of the most effective disease prevention methods. Vaccines are safe, efficacious, and straightforward for competently trained health professionals to administer. They provide protection against both health and economic impacts of epidemics caused by vaccine preventable infectious diseases.<sup>1</sup>

The ACT Government has facilitated greater patient access to vaccines by approving several important changes to the *ACT Pharmacist Vaccination Standards*. These regulatory changes have enabled pharmacist immunisers to administer a wider range of vaccines.

#### **Missed opportunities**

Where the ACT was once a leader in enabling pharmacists to administer vaccines that other Australian jurisdictions had yet to permit, ACT pharmacist immunisers are now lagging, as highlighted in *Figure 1*.

In the ACT, as well as across Australia, improving immunisation rates in all age groups is crucial. Immunisation rates for respiratory syncytial virus (RSV) in pregnancy and pneumococcus in older adults as well as pertussis, measles and human papillomavirus (HPV) have all declined since the COVID-19 pandemic. As a result, people who would have otherwise received critical vaccinations through well-established pathways are falling through the cracks, putting Canberrans at risk from preventable infectious diseases. Allowing pharmacists to administer a greater number of vaccines will enhance vaccine accessibility and protect Canberrans from preventable infectious diseases.

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<sup>1</sup> Menzies RI, Leask J, Royle J, et al. Vaccine myopia: adult vaccination also needs attention. *Med J Aust* 2017 Apr 3; 206(6):238–9. At: [www.mja.com.au/system/files/issues/10.5694mja16.00811-amended.pdf](http://www.mja.com.au/system/files/issues/10.5694mja16.00811-amended.pdf)

Figure 1. State and territory comparison of vaccines with regulatory approval for pharmacist administration. (The number in each box refers to the permitted minimum age for that specific vaccine, in each jurisdiction).

	Cholera	COVID-19	DTP	Hib	Hep A	Hep B	Hep B zoster	Herpes	HPV	Influenza	J/E	MMR	Men ACWY	Men B	Men C	mPox	Pneumo-coccal	Polio	Q fever	Rabies	Rotavirus	RSV	TB	Typhoid	Varicella	Yellow fever
ACT		5	5	5	5	5*	18	10	5	5	5*	5	5	5	5	16	50 / 70	5		5		60 / ✓ <sup>^</sup>		5	5	
NSW		5	5	5	5	5*	18	9	5	5	5*	5	5	5	5	16	50 / 70	5		5		60 / ✓ <sup>^</sup>		5	5	
NT		5	5	5	5	5	5	5	5	5	5	5	5	5	5	18	5	5				5			5	
QLD	2	✓	2	2	2	2	2	2	✓ <sup>^</sup>	2	2	2	2*	2	2		2	2				✓		2	2	
SA	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
TAS		5	10		10	10*	18	10	5		10*	10	10				10	10				60 / 18 <sup>^</sup>			10	
VIC		5	5 <sup>#</sup>		5~	5~	5 <sup>§</sup>	5 <sup>§</sup>	5	5	5 <sup>§</sup>	5 <sup>§</sup>				5	5 <sup>§</sup>	5~				5		5~		
WA		5	5			5*	5	5	5*			5*	5	5	5		5	5				5			5	

**NIP or CVCP funded for eligible patients**

NIP funded vaccines may not be available for ordering by community pharmacies.

**State funded vaccines for eligible patients (asterisk \* denotes additional eligibility beyond NIP)**

**IMPORTANT:** Additional restrictions may apply. Refer to state/territory pharmacist vaccination authorisations. Pharmacists must adhere to individual scope of practice, recommendations of the Australian Immunisation Handbook and ATAGI

**Non-govt funded vaccines only**

**Not permitted**

~Only under Victorian Community Pharmacist Pilot (VCCPP);  
<sup>#</sup>For travel, min age 12 + only under VCCPP;  
<sup>§</sup>For travel, min age 15 + only under VCCPP;  
<sup>^</sup>For travel, min age 50 + only under VCCPP;  
<sup>^</sup>Pregnant women 28–36 wks gestation

### The proposed approach

South Australian Minister for Health Chris Picton MP recently announced changes to local regulations that enable pharmacist immunisers to initiate and administer all vaccines in accordance with the Australian Immunisation Handbook or in any other case as specified by the SA Health Minister.

PSA recommends regulatory change to expand the scope of vaccines in line with South Australia.

### Why it will work

ACT has a well-established, well-distributed network of community pharmacies, many of which operate extended trading hours. This network provides a highly accessible and convenient location to expand and increase patient access to vaccinations.

Pharmacist immunisers are trained, certified and experienced. Increasing patient options and improving access by expanding the range of vaccinations that pharmacists can administer will have a positive impact on vaccination rates. By improving vaccination rates, pharmacists can help to ease pressure on ACT general practices, hospital emergency departments, walk-in centres and other ACT health facilities; places that can become overcrowded during serious outbreaks.

### Budget implications and funding model

Making the necessary regulatory changes requires **nil direct investment** from the ACT Government.

The costs of NIP-subsidised vaccines are already accounted for in state and federal budgets based on eligibility criteria and population data. This means a marginal cost is involved in the logistical reallocation and distribution of NIP vaccines to an increased number of providers.

The National Immunisation Program Vaccinations in Pharmacy (NIPVIP) Program covers the administration costs of NIP vaccines in approved settings. Individual pharmacies may choose to charge a service fee for non-NIP vaccines.

## Benefits for Canberrans

- Increased access to a broader range of vaccinations and increased immunisation rates for the ACT community.
  - Increased options and reduced wait time for patients to receive vaccinations.
  - Reduced disease burden from vaccine preventable diseases.
  - Decreased pressure on general practitioners (GPs) and emergency departments.
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### Improve access to primary care for Canberrans via prescribing pharmacists

PSA recommends the ACT Government expand the scope of pharmacist practice to include a broader range of conditions, including pharmacist provision of services for chronic health conditions.

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#### **The challenge**

Canberra's health system is under significant pressure, with access to primary care becoming increasingly difficult.<sup>2</sup> One of the key challenges is the shortage of GPs. Canberrans have access to 23% fewer GPs per capita compared to residents of other major cities such as Sydney, Melbourne or Brisbane.<sup>3</sup> Prescribing pharmacists can improve timely and safe access to care to deliver benefits for patients and the community.

The ACT also has the lowest rate of bulk billing GPs in the country, making it harder for patients to access affordable, acute care when and where they need it.

Simultaneously, unnecessary red tape is preventing pharmacists from practising to their full scope. As other jurisdictions like Queensland have moved forward to allow pharmacists to prescribe for a wide range of common acute and chronic conditions, the ACT is falling behind.

Under current ACT legislation, pharmacies are required to apply for a separate *Medicines Poisons and Therapeutic Goods (MPTG) - Other* license for each medical condition they wish their pharmacists to prescribe for. This process requires pharmacies to wait for license approvals, delaying their ability to provide much-needed care.

#### **The proposed approach**

Regulatory change is required to boost Canberrans' access to acute care when and where they need it most.

PSA is preparing the workforce by providing training, education, and practice support to upskill pharmacists, ensuring they are equipped to deliver these services safely and effectively. PSA has already developed training to support pharmacists in Queensland to treat a range of acute conditions under the Queensland community pharmacy pilots. This training can be made available to ACT pharmacists.

The training requires a large time and financial investment from pharmacists to complete. The required training is comprehensive and robust, and takes 12 months to complete, and costs approximately \$12,000. The time commitment from the enrolled pharmacist is 20% of a full-time work commitment.

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<sup>2</sup> Royal Australian College of General Practitioners. Not good enough: next ACT government must attract GPs [media release]. 3 Sep 2024. At: [www.racgp.org.au/gp-news/media-releases/2024-media-releases/september-2024/not-good-enough-next-act-government-must-attract-g](http://www.racgp.org.au/gp-news/media-releases/2024-media-releases/september-2024/not-good-enough-next-act-government-must-attract-g)

<sup>3</sup> Royal Australian College of General Practitioners. GP training recovers in the ACT, but Canberra remains worst capital for GP access [media release]. 22 Jan 2025. [www.racgp.org.au/gp-news/media-releases/2025-media-releases/january-2025/gp-training-recovers-in-the-act-but-canberra-remains-worst-capital-for-gp-access](http://www.racgp.org.au/gp-news/media-releases/2025-media-releases/january-2025/gp-training-recovers-in-the-act-but-canberra-remains-worst-capital-for-gp-access)

The upfront cost of the training course is the main barrier to access for more ACT pharmacists to graduate as prescribing pharmacists.

Providing government funding for pharmacists to complete the necessary training will accelerate the implementation of a wider range of healthcare services in community pharmacies. It will equip and expand the pharmacist workforce to address both existing and emerging health challenges. Funding could also be provided through a cost-share arrangement with pharmacists.

### ***Why it will work***

Consumers have a high degree of trust in pharmacists, with nine in ten supporting a greater prescribing role for them. There is also strong consumer confidence in pharmacists' ability to provide a broader range of treatments for acute conditions, and to manage chronic conditions effectively.<sup>4</sup>

Pharmacists have demonstrated their ability to adapt to the increasingly complex health needs of Australians, the ageing population and overstretched health system. By expanding their role as acute health hubs within communities, trained pharmacists will provide greater access to health services across ACT, alleviating pressure on emergency departments and GPs.

The ACT Government is looking to identify opportunities to deliver high quality, more timely and more accessible patient-centred care, to take pressure off the healthcare system and reduce emergency department presentations.

PSA proposes that training two pharmacists per pharmacy in the ACT will provide adequate coverage and access to care for Canberrans. This would ensure that access to care is spread across Canberra's 88 community pharmacies.

### ***Budget implications***

Making the necessary regulatory changes requires **nil direct investment** from the ACT Government.

To support implementation, **\$2 million is sought over 2 years** to upskill the pharmacist workforce and overcome cost barriers to necessary training. PSA estimates a cost of \$2 million will fully fund 180 ACT pharmacists to undertake prescribing and clinical training based on the Queensland clinical model. This would allow an average of two pharmacists per community pharmacy to complete training.

## **Benefits for Canberrans**

- Greater access to healthcare services, in a timely manner.
- Equitable access to care in community pharmacies across ACT.
- Reduced pressure on emergency departments and GPs.

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<sup>4</sup> Pharmaceutical Society of Australia. Pharmacists in 2030. Canberra: PSA; 2024. At: [www.psa.org.au/advocacy/working-for-our-profession/pharmacists\\_in\\_2030](http://www.psa.org.au/advocacy/working-for-our-profession/pharmacists_in_2030)