

KEY POINTS

- Internet pharmacies have the potential to improve access to medicines, especially for consumers with limited access to healthcare services and professional advice.
- The top three Australian online pharmacies were interrogated to review information presented to consumers concerning the provision of certain Schedule 3 (S3) Pharmacist Only Medicines.
- The information regarding the provision of S3 medicines from online pharmacies is inconsistent and, at times, incorrect or misleading.
- Inconsistent application of S3 guidance by online pharmacies has the potential to create widespread confusion about the availability of S3 medicines from pharmacies.
- The provision of medicines by pharmacists should be guided by the law, Professional Practice Standards and Competency Standards, and in a patient's best interest.



Access to Pharmacist Only Medicines from online pharmacies in Australia

THE INTERNET HAS CHANGED THE WAY WE DO EVERYTHING, INCLUDING BUYING MEDICINE. BUT, DO ALL OF AUSTRALIA'S ONLINE PHARMACIES OFFER APPROPRIATE LEVELS OF SERVICE AND ADVICE WHEN IT COMES TO THE PROVISION OF NON-PRESCRIPTION S3s?

Many people now purchase medicines or have prescriptions dispensed by online pharmacies, which provide information to consumers as to whether a prescription or pharmacist's advice is required before a medicine can be supplied. Obviously, this advice isn't provided face-to-face.

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Indirect pharmacy services are appropriate when face-to-face contact with patients is not possible.¹ The Pharmacy Board of Australia views internet or mail-order dispensing as "less than the optimal way of delivering a pharmacy service because communication may be compromised".² Communication is important as pharmacists are required to assess therapeutic need and provide advice and information relevant to the consumer's need.¹

Pharmacist Only Medicines (defined under Schedule 3 (S3) of the Poisons Standard) require professional advice from a pharmacist to be available without a prescription.³ Professional Practice Standards dictate that a pharmacist must be directly involved in the provision of S3 medicines.¹

The provision of S3 medicines by internet or mail order is compromised due to the lack of face-to-face consultation between pharmacist and consumer. One foreseeable method of managing indirect S3 provision, without establishing therapeutic need, would be to require consumers to obtain a prescription. Anecdotal reports suggested that some Australian online pharmacies provided inconsistent and misleading information to consumers about the provision of S3 medicines.

In order to assess the validity of these reports, the information relating to the provision of S3 medicines from a selection of online pharmacies was examined. On 3 September 2014 the top three Australian online pharmacies were identified using Google

search terms "mail order pharmacy Australia". Their websites were interrogated to determine the information presented to consumers regarding the provision of the following S3 products: Nurofen Plus Tablets, Rikodeine Linctus, Postinor-1 Tablet, Ego DermAid Cream, Hydrozole Cream, Restavit Tablets and Maxigesic Tablets.

Online pharmacy #1 presented incorrect and misleading information on the availability of all but one of the S3 medicines reviewed. The other S3 medicines were accompanied by the following statement: "A valid Australian prescription is required before this item can be shipped. In accordance with Australian regulations, we can only dispense prescription medicine on receipt of the original prescription



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written by an Australian registered medical practitioner [...] There are no exceptions to this, we are bound by Australian Law.” This explanation is incorrect as S3 medicines can be supplied without a prescription with appropriate pharmacist consultation.

Information on the provision of S3 creams containing hydrocortisone was inconsistent: hydrocortisone 1% 30g creams (DermAid, Sigmacort) required a prescription while hydrocortisone 1% plus clotrimazole 1% (Hydrozole 30g) was presented as requiring pharmacist advice but not a prescription.

Pharmacy #2 had contradictory information in relation to hydrocortisone-containing creams. DermAid brand was presented as a Pharmacist Only Medicine, requiring “pharmacist advice for us to send it to you. If you order this product, you will be required to call us within 48 hours...”, while Cortic DS brand was presented as both a Prescription Only and Pharmacist Only Medicine in a single entry.

Other inconsistent information related to emergency contraception and dihydrocodeine cough linctus, which were presented as requiring prescriptions, while many other S3 medicines did not.

Pharmacy #3 was consistent in its approach to provision of S3 medicines and provided the following appropriate explanation to consumers as to why a prescription was required: “According to Poisons and Therapeutics Goods Regulation 2008, schedule 3 medications have to be supplied personally by pharmacists. Since this cannot happen with online, mail, fax, and telephone orders, [Pharmacy #3] requires a valid prescription from an Australian registered doctor to satisfy that you have been given the opportunity to seek advice as to the use of this medication, in respect to the dosage, frequency of

TABLE 1: Results of information provided on certain S3 medicines from selected Australian online pharmacy websites

	Online Pharmacy 1	Online Pharmacy 2	Online Pharmacy 3
Nurofen Plus Tablets 30 (ibuprofen 200mg + codeine phosphate 12.8mg)	Prescription Required	Pharmacist Only Medicine – must ring pharmacist	Prescription Required [#]
Rikodeine Cough Linctus 200mL (dihydrocodeine 1.9mg/mL)	Prescription Required	Prescription Only	Prescription Required [#]
Postinor-1 Tablet (levonorgestrel 1.5mg)	Prescription Required	Prescription Required	Prescription Required [#]
Ego DermAid Cream 30g (hydrocortisone 1%)	Prescription Required	Pharmacist Only Medicine – must ring pharmacist	Prescription Required [#]
Hydrozole Cream 30g (hydrocortisone 1% + clotrimazole 1%)	Pharmacist advice required	Pharmacist Only Medicine – must ring pharmacist	Prescription Required [#]
Restavit Tablets 20 (doxylamine 25mg)	Prescription Required	Pharmacist Only Medicine – must ring pharmacist	Prescription Required [#]
Maxigesic Tablets 16 (paracetamol 500mg + ibuprofen 150mg)	Prescription Required	Unrestricted unless 2 or more packs are ordered then Pharmacist Only*	Prescription Required [#]

Bolded entries denote incorrect advice to consumers and/or inappropriate explanation.

* Incorrect information, all quantities of Maxigesic are S3

With appropriate explanation as to why a prescription is required

administration and general toxicity of the substance.”

Of the online pharmacy websites reviewed there were inconsistencies between and within the sites in relation to the provision of certain S3 medicines. While the number of pharmacies selected was small they were the most prominent online pharmacies at the time of the review and therefore the most likely to be searched by consumers.

Pharmacy #3 was the only online

non-prescription medicines may further delay or hinder timely access.

From the websites of Pharmacies #1 and #2 there was no apparent justification why some S3 medicines required a prescription when others did not. Conceivable explanations for treating certain S3 medicines differently to others might be: potential for abuse, misuse, overuse or diversion; systemic versus topical routes of administration; or the sensitive nature of a request. However, when compared to the information on the websites, none of these explanations seemed to apply. The information being provided is inconsistent and, at times, incorrect or misleading.

Australia subscribes to a carefully considered step-wise approach to medicines scheduling,³ and a Quality Use of Medicines (QUM) framework, which encompasses timely access; and judicious, appropriate, safe and effective use of medicines.⁴ The trade-off between these principles underpins the choices made by online pharmacies in relation to the supply of S3 medicines.

■ OF THE ONLINE PHARMACY WEBSITES REVIEWED THERE WERE INCONSISTENCIES BETWEEN AND WITHIN THE SITES IN RELATION TO THE PROVISION OF CERTAIN S3 MEDICINES

pharmacy to present a consistent message that provided appropriate information to consumers, even though they required a prescription for all S3 medicines reviewed. For consumers with limited access to healthcare services, where indirect pharmacy supply may be relied upon, requiring a prescription for

However, despite the internet being an essential part of the interaction between online pharmacies and consumers, the use of technology that could better inform these choices appeared to be ignored. Video-conferencing, e.g. Skype, is accessible to all internet users and familiar to many. Video-conferencing may assist with the assessment of therapeutic need and the provision of advice and information relevant to the consumer's need. Geolocation, i.e. the pairing of an IP address with a geographical location, may be used to assess whether location is a barrier to timely access to health services. Commonly used internet technology has the potential to improve the assessment of need and the provision of pharmacist advice and information.

Internet pharmacies have the

potential to improve access to medicines, especially for consumers with limited access to healthcare services and professional advice. At present, online access to Pharmacist Only Medicines is inconsistent

internet. Ultimately the provision of medicines by pharmacists should be guided by the law, Professional Practice Standards and Competency Standards, and in a patient's best interest.^{1,5-7} ■

■ POOR EXPLANATIONS [ONLINE] OF S3 SUPPLY AND INCONSISTENT APPLICATION OF S3 GUIDANCE HAS THE POTENTIAL TO CREATE WIDESPREAD CONFUSION

and may not be in a patient's best interest. Misleading consumers as to the requirement for a prescription due to poor explanations of S3 supply and inconsistent application of S3 guidance has the potential to create widespread confusion about whether Pharmacist Only Medicines are indeed available from a community pharmacy, as many people check information on the

1. Pharmaceutical Society of Australia. Professional Practice Standards – Version 4. 2010; www.psa.org.au/download/standards/professional-practice-standards-v4.pdf. Accessed 3 September 2014.
2. Pharmacy Board of Australia. Guidelines for Dispensing of Medicines. 2011; www.pharmacyboard.gov.au/Codes-Guidelines.aspx. Accessed 3 September 2014.
3. Therapeutic Goods Administration. Poisons Standard (Standard for Uniform

Scheduling of Medicines and Poisons) 2013; www.comlaw.gov.au/Details/F2013L01607. Accessed 3 September 2014.

4. Australian Government Department of Health and Ageing. National Medicines Policy. 2000; [www.health.gov.au/internet/main/publishing.nsf/Content/B2FFBF7209EEAC8CA257BF0001BAF3F/\\$File/NMP2000.pdf](http://www.health.gov.au/internet/main/publishing.nsf/Content/B2FFBF7209EEAC8CA257BF0001BAF3F/$File/NMP2000.pdf). Accessed 3 September 2014.

5. Pharmaceutical Society of Australia. Code of Ethics for Pharmacists. 2011; www.psa.org.au/download/codes/code-of-ethics-2011.pdf. Accessed 3 September 2014.

6. Pharmacy Board of Australia. Code of Conduct for Pharmacists. 2014; www.pharmacyboard.gov.au/Codes-Guidelines.aspx. Accessed 3 September 2014.

7. Pharmaceutical Society of Australia. National Competency Standards Framework for Pharmacists in Australia. 2010; www.psa.org.au/download/standards/competency-standards-complete.pdf. Accessed 3 September 2014.



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