
Draft National Action Plan on Antimicrobial Resistance 2017-2020

Comments from:

The Pharmaceutical Society of Ireland (PSI) - The Pharmacy Regulator

The Pharmaceutical Society of Ireland (PSI) is an independent statutory body, established under the Pharmacy Act 2007. It is charged with, and is accountable for, the effective regulation of pharmacy services in Ireland, including responsibility for supervising compliance with the Act. The PSI is also charged with ensuring compliance with certain medicines and controlled drugs legislation. It works for the public interest to protect the health and safety of the public by regulating the pharmacy profession and pharmacies.

The PSI welcomes this opportunity to provide comments on the draft National Action Plan on Antimicrobial Resistance 2017-2020.

The PSI recognises the serious problem of antimicrobial resistance with the consequential increasing threat to public health and welcomes the implementation of a National Action Plan to address this threat including decreasing the inappropriate use of antimicrobial medicines as a matter of urgency. The PSI are very supportive of the 'whole of Government' and 'One Health' approach on this issue which recognises that collaborative action is needed across the health, agricultural and environmental sectors to achieve the best outcomes for people, animals and our environment.

As part of its function as regulator, the PSI is responsible for defining and ensuring the standards of education and training for pharmacists qualifying in Ireland. This includes developing standards, policies and carrying out accreditation of pharmacy degree programmes. The PSI also ensures that registered pharmacists undertake appropriate continuing professional development (CPD). As the regulatory body the PSI recognises the vital role pharmacists have to play in the provision of high quality, cost effective and integrated care services, for the benefit of patients and the public. To achieve these aims, the PSI also works to assure high standards of patient care and good pharmacy practice in pharmacies in Ireland.

The PSI have reviewed the draft Action plan and found the document comprehensive well drafted in its approach to address the concern of antimicrobial resistance. In support of our duties in pharmacy education and practice, PSI is happy to contribute as a key stakeholder in this important public health initiative. We can see a direct role for PSI in many of the draft specific interventions in particular those involved implementation of awareness strategies (1.1&1.7) in education of healthcare practitioners (1.2), ensuring correct disposal of antimicrobials (1.6).

In addition the PSI can also see where pharmacists can contribute as part of the health system to this strategy and outline below the areas of the strategy that affect the pharmacy profession:

Strategic objective 1: Improve awareness and understanding of antimicrobial resistance through effective communications, education and training.

Due their professional knowledge and expertise in the science and use of medicines pharmacists have a key role in maximising the many benefits arising from medicine use and also minimising the potential for patient harm. The PSI would therefore see a critical role for pharmacists in implementation of this national action plan by utilising pharmacists' knowledge to ensure the safe and rational use of antimicrobials in the health system. This applies in their role in the supply of both human and animal medicines. They therefore have a key role in implementing strategic objectives on in educating and improving understanding in the general public and those in agriculture and farming (1.2,1.4& 1.7), and ensuring correct disposal of antimicrobials (1.6)

The PSI would like to bring to your attention a relevant recent report carried out by the PSI called 'Future Pharmacy Practice in Ireland- Meeting Patients' Needs'¹. This Report researched and made recommendations on where pharmacists should most valuably contribute to patient care in our health system. Many of the recommendations made as part of this Report supports the strategies outlined in the draft national plan in particular the role pharmacist should play in contributing to Government public health initiatives.

As part of the Report, PSI commissioned independent research that established, approximately 50% of the population (2 million people), both healthy and ill, visiting a pharmacy every month². The report considers therefore that pharmacists are therefore ideally placed in the community to support Government health and wellbeing programmes and in the interest of quality patient care, the PSI would like to ensure that pharmacists are integrated in national awareness campaigns to ensure public health campaigns avail of this high level of contact with the public(1.2&1.7).

Pharmacists also have a key role in supporting patients to manage minor and self-limiting conditions with non-prescription medicines and self-care measures, as well as helping to educate the public on the appropriate use of antibiotics, hygiene measures to decrease the spread of infections and awareness about the overuse of antibiotics. Due to their availability, community pharmacies are also one of the key partners, alongside the HSE and Department of Health, in the promotion of national health campaigns (1.7).

Ensuring safe disposal of medicines (1.6): Regulation 4(5) of the Regulation of Retail Pharmacy Businesses Regulations 2008 requires that 'the pharmacy owner shall ensure that any disposal of medicinal products, including veterinary medicinal products, that may be required to be carried out in the course of conducting a retail pharmacy business, is carried out in a manner which will not result in any danger to public health or risk to the environment'. Pharmacists also have a key role in educating patients on the safe disposal of medicine. The PSI has issued [Guidelines on the Disposal of Medicinal Products for a Retail Pharmacy Business](#) which states: Pharmacists should ensure patients

¹ This PSI report 'Future Pharmacy Practice in Ireland- Meeting Patients' Needs' was published in November 2016 and is available to view at www.psi.ie. This report is fundamentally about patients, and how the pharmacy sector can continue to contribute to public and patient care. It aims to build on the existing good practice and patient trust currently in place, to develop new practices to meet the evolving needs of the patient and the health system of the future.

² B&A Quantitative research on pharmacy usage and attitudes. April 2016. www.psi.ie

and/or their carers have sufficient and appropriate information on the safe disposal of medicinal products, e.g. in the event of a course of treatment not being completed. Patients should be facilitated and encouraged to return unwanted or expired medicinal products to the pharmacy for disposal.

Strategic objective 2: Develop a national surveillance system for antimicrobial resistance:

Pharmacists in primary care dispense and supply prescription only medicines against both public and private prescriptions, they are therefore in a key position to assist in the monitoring of antimicrobial prescribing and use by patients. (2.1). Antimicrobial pharmacists in the hospital setting have a direct role also in this area. Please see below for further details.

Strategic Objective 3&4-National infection prevention and control programmes:

GP surgeries and pharmacies are essential components of primary care and are uniquely positioned to provide support and treatment for patients as close to their own home as possible and in the lowest cost setting for the health system, thus reducing the risk of Healthcare Associated Infections (HCAI). Enhancing the frontline professional services in primary care including pharmacies would further support home care and cost-effective care within the community.

Antimicrobial stewardship (Strategic intervention 3.2, 4.1, 4.3, 4.4)

A recent HIQA Report on the review of antimicrobial stewardship in public acute hospital recognises the important role of the antimicrobial pharmacist as on the antimicrobial stewardship team. The current evidence indicates that specialist pharmacists such as antimicrobial pharmacists inform on best practice prescribing protocols and guidelines and to share specialist knowledge through education of the wider healthcare team and patients about the correct use of antimicrobials. This HIQA report also recognises the importance of the wider clinical pharmacy service in the hospital in ensuring antimicrobial prescribing guidelines, policies and procedures developed by the antimicrobial stewardship programme are followed and implemented in patient care.

Pharmacist's role in vaccination programmes (Strategic intervention 3.4)

Legislation was amended in 2011 to authorise trained pharmacists to administer the influenza vaccine in pharmacies. Since this time there has been a year on year increase in the number of vaccinations administered in community pharmacy (figures from HSE PCRS state that 53,047 patients were vaccinated across 691 community pharmacies in the 2014/2015 flu season); it is clear that enabling pharmacists to administer this vaccine has increased access to, and therefore uptake of this vaccine in the population. In October 2015 legislation was further amended to authorise trained pharmacists to administer two additional vaccines, the pneumococcal polysaccharide and herpes zoster (shingles) vaccines. Training for these services is available for pharmacists through the [Irish Institute of Pharmacy](#).

In addition pharmacists can contribute to awareness campaigns and maximising uptake of vaccines. There is evidence that the recommendation of a known trusted health professional can lead to increased vaccine uptake. As an accessible frontline healthcare worker, pharmacists have a key role in the provision to the public of accurate and factual information, and reassurance, about vaccines.

Conclusion:

PSI would again like to express our support for the draft National Plan and can see a role for PSI and pharmacists in the drafting and implementation of this plan. PSI is happy to contribute to the further development of this work.

Pharmaceutical Society of Ireland

April 2017