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MRA Review
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**REVIEW OF TRANS TASMAN MUTUAL RECOGNITION ARRANGEMENT**

Thank you for the opportunity to comment on your draft research report evaluating the efficacy and effectiveness of the Trans Tasman Mutual Recognition Arrangement (TTMRA). The Pharmaceutical Society of New Zealand (the Society) is the statutory and regulatory body for pharmacists and pharmacies in New Zealand. We wish to make the following corrections and comments.

1. Table 4.5 in the draft report is a reproduction from our submission of the trans Tasman movement of pharmacists using mutual recognition to register in Australia and New Zealand over the past four years. Since our initial submission we have reviewed the figures, recalculated them from base data and found differences. The correct figures are:

| | Aust pharmacists in to NZ | NZ pharmacists out to Aust |
|---|---|---|
| 1999 | 9 | 21 |
| 2000 | 2 | 32 |
| 2001 | 3 | 33 |
| 2002 | 6 | 50 |
| 2003 to August | 2 | 15 |

*Aust pharmacists in to NZ* = pharmacists from Australia who have been registered in that year to practice in New Zealand. It does not include any who made enquiries, but never followed through to registration here. Year of registration here may not be the same year that a Certificate of Identity was given by their Australian Pharmacy Board. Includes Western Australia.

*NZ pharmacists out to Aust* = Certificates of Identity issued to New Zealand pharmacists wishing to apply for registration in an Australian State. Includes Western Australia.

We apologise for giving inaccurate figures in our first submission – we overlooked a database!

2. Table 4.4 in the draft report gives figures of New Zealand pharmacists registered in Australian states in the 2001 year. We question their accuracy. Certificates of Identity issued to New Zealand pharmacists to use in making application for registration in each state in 2001 are:

| | **PSNZ figures** | **Table 4.4** |
|---|---|---|
| NSW | 12 | 41 |
| QLD | 14 | 13 |
| VIC | 15 * | not provided |
| SA | 0 | 6 |
| NT | 0 | 3 |
| ACT | 3 | 4 |
| TAS | 1 | 1 |

We accept that a New Zealand Certificate of Identity may not necessarily result in registration in Australia. A certificate issued in the later part of 2001 may not result in a registration until the early part of 2002. Applicants may also change their mind and not complete registration in Australia. In spite of this, we are surprised that the NSW figures are so different and would like to ask the Pharmacy Board of NSW to review their figures.

An alternative explanation is that the title of Table 4.4 in the draft review is incorrect, and 2001 should be replaced by 1998 – mid 2002. Even so, there is little correlation with figures from the Pharmaceutical Society of New Zealand.

3. We wish to make clear the reason for the attachment to our initial submission that described the registration process for **non**-TTMR applicants e.g. from Australian, and **non**-reciprocal applications eg from Great Britain, Northern Island and Ireland. It was attached to show that there is no easy 'back door' entry of overseas pharmacy graduates into Australia via New Zealand through TTMR.

4. We note the Kensington Swan legal opinion referring to the TTMRA permitting conditions to be imposed for the purpose of achieving equivalence of occupation, was not reproduced on your website with our submission.

5. We are pleased that the review supports (in preliminary finding 5.8) registering bodies imposing 'local knowledge' conditions before granting registration in order to achieve equivalence of occupation. To this end the Pharmaceutical Society of New Zealand requires applicants to undertake four weeks supervised pharmacy practical training to gain familiarity with our laws, ethics and medicines subsidy procedures, followed by a satisfactory interview by an approved practising pharmacist.

We would prefer on page 79, the final sentence of the *Local Knowledge* section referring to our submission, to read "…….. allows them to require applicants to undertake four weeks supervised pharmacy practical training to gain familiarity with New Zealand laws, ethics and medicines subsidy procedures, followed by a satisfactory interview by an approved practising pharmacist."

6. The correct title of the HPCA Bill currently before the New Zealand parliament (first paragraph of *Current Competency* section on page 79) is the Health Practitioners Competence Assurance Bill. In the early days of its development the term Competency was used, but since its introduction to parliament it has been Competence.

Thank you again for the opportunity to participate in the review.

Yours sincerely,

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