



The Pharmacy
Guild of Australia

SUBMISSION

Inquiry into vaccine related fraud and security risks

Comments by the Pharmacy Guild of Australia to the Parliamentary Joint Committee on Law Enforcement

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National Secretariat

Level 2, 15 National Circuit, Barton ACT 2600
PO Box 310, Fyshwick ACT 2609
P: +61 2 6270 1888 • F: +61 2 6270 1800 • E: guild.nat@guild.org.au
www.guild.org.au



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INTRODUCTION

The Pharmacy Guild of Australia (the Guild) is the peak national pharmacy organisation representing community pharmacy. The Guild aims to promote, maintain and support community pharmacies as the most appropriate primary providers of health care to the community through optimum therapeutic use of medicines, medicines management and related services.

As the Interim Report on the Inquiry into vaccine related fraud and security risks indicates, the potential risk areas for vaccine fraud are vast. As the organisation representing community pharmacy in Australia, the Guild is committed to the safe delivery of all vaccines, including COVID-19 vaccines, to the Australian population. We note that in addition to evolving arrangements that may mandate COVID-19 vaccination for travel or some industries in Australia, there can also be mandatory vaccination requirements for other vaccines such as yellow fever.¹ As community pharmacists in Australia do not administer these other vaccines, our response to the Interim Report will be limited to the risk to vaccine services in community pharmacy and solutions that community pharmacy may be able to offer.

As health care professionals, pharmacists have professional obligations regulated by the Pharmacy Board of Australia,² including complying with a Code of Conduct for Pharmacists as well as professional and competency standards. Pharmacy owners who must also be a registered pharmacist have additional standards to meet to maintain the legal and professional integrity of their business.³ In addition, over 94% of community pharmacies in Australia are accredited under the Quality Care Pharmacy Program (QCPP)⁴ which means they comply with the Australian Standard AS85000:2017 - quality management system for pharmacies in Australia.

B) Criminal activity around the supply of fake vaccines, black market vaccines and/or fake vaccine certifications and the acquisition of certificates

Potential for fake or black-market vaccines in the Australian supply chain

The Guild is unaware of any criminal activity relating to the supply of fake COVID-19 vaccines in Australia. Indeed, the Interim Report references the Attorney General's Department statement that "Australia has not seen significant scam and fraud activity related to the COVID-19 vaccination roll-out."⁵ This is a sign of the robustness of the Australian vaccine supply chain. Yet there are reports of COVID-19 vaccine fraud occurring overseas, and it is important to acknowledge that although criminal activity in the Australian vaccine supply chain is unlikely, it is not impossible.

The Guild understands the importance of remaining vigilant in efforts to suppress fraudulent medicines activity wherever it may arise. The specialised knowledge of pharmacists along with community pharmacy procedures mitigate any such risks. Pharmacists can recognise medicines without authentic packaging and have procedures for managing medicines that are potentially fraudulent. Further, in the case of COVID-19 vaccination, since the Australian Government pays for these vaccines, there are no incentives for vaccinators to seek fake vaccines. The risk of fake COVID-19 vaccines is also reduced by the TGA approval process and batch testing of vaccines, helping support supply chain robustness.

¹ <https://www1.health.gov.au/internet/main/publishing.nsf/Content/health-pubhlth-strateg-communic-factsheets-yellow.htm>

² <https://www.pharmacyboard.gov.au/>

³ Guidelines for proprietor pharmacists; <https://www.pharmacyboard.gov.au/Codes-Guidelines.aspx>

⁴ Vital Facts on Community Pharmacy, https://www.guild.org.au/data/assets/pdf_file/0033/107889/PGA_June_250621_infographic.pdf

⁵ Interim report, p7 (1.32)

Community pharmacies can only order COVID-19 vaccines using the Commonwealth Vaccine Administration System. Once stock has been delivered, the pharmacies follow strict procedures for the secure, temperature-controlled storage, dispensing, supply and disposal of medicines. The procedures for COVID-19 vaccines are similar to procedures for other vaccines administered by community pharmacies, however they include additional requirements set by the Commonwealth Government. Community pharmacy procedures related to stock management, supply and administration of vaccines are guided by Quality Use of Medicines (QUM) principles, Professional Practice Standards and guidelines, and QCPP requirements. The high standards of these principles and requirements are integrated into the supply of all medicines in community pharmacy.

Fraudulent certification of vaccination status

The Interim Report identifies fraudulent vaccination certificates as another concern. Community pharmacies have digital systems in place that facilitate accurate patient record keeping and the secure dispensing of medicines. As vaccination providers, it is mandatory for pharmacist immunisers to upload vaccination records onto the Australian Immunisation Register (AIR). This enables an accurate immunisation history to be recorded for an individual and enables official vaccination summaries and certificates to be issued by the Australian Government. Vaccination records are uploaded to the AIR via systems developed to facilitate the secure transmission of this information. Use of these secure systems is one way community pharmacies contribute to combating vaccination certificate related fraud. We recommend that any national digital solution for proving a person's vaccination status, for travelling or entering venues for example, should primarily rely on AIR data as the single source of truth to mitigate fraud relating to vaccination status.

With the need to provide proof of vaccination status becoming more relevant as Australia begins to relax public health measures, vaccination certificate fraud is an ongoing concern. There have been a small number of reports by COVID-19 vaccination rollout participating pharmacists of persons asking them to falsify Australian Immunisation Register records such that an individual may obtain a genuine COVID-19 vaccination certificate issued by the Australian Government. In some cases pharmacists have been offered significant financial inducement.⁶ Another concern is reports of individuals other than the person who has made the vaccination booking presenting for vaccination at a pharmacy for the purpose of enabling a vaccine hesitant person to obtain a genuine COVID-19 vaccination certificate without receiving the vaccine.

Vaccination status fraud will likely become more prevalent and as such there should be standardised reporting procedures as well as legislated penalties for individuals engaging in this type of behaviour, both for the citizen and the healthcare professional. Community pharmacists have high integrity and pharmacy representative organisations have been proactive about assisting pharmacy staff in dealing with online and in-store harassment, but it should not be incumbent upon pharmacists to police these activities. Penalties, akin to those that apply to quarantine breachers and those who ignore mandatory vaccination orders, should also apply to those seeking to bribe a vaccinator to falsify records or to manipulate records, either digitally or by having someone else get vaccinated in their place. The focus should be on discouraging the practice in the first instance. Some pharmacists are starting to feel intimidated and exposed by such events and there should be legislative pathways to protect them.

⁶ <https://ajp.com.au/news/pharmacist-knocks-back-1k-jab-bribe/>

Community pharmacy actively contributes to reducing the risk of vaccination certificate fraud with the implementation of strict processes and procedures for COVID-19 vaccine administration. These include processes and procedures for confirming the identity of individuals presenting for vaccination, as well as assessing an individuals' eligibility for vaccination by checking the Australian Immunisation Register before administration of a vaccine.

Following these processes and procedures has enabled pharmacists to identify instances of potential vaccination fraud and address the situation by denying administration of a COVID-19 vaccine to the individual involved. While pharmacists are adept at reporting prescription fraud and having difficult conversations with individuals potentially partaking in fraudulent behaviour, there has been no guidance given to COVID-19 vaccination providers on whether potential COVID-19 vaccination fraud needs to be formally reported to police or an alternative regulator. Consideration should be given to establishing a dedicated system for COVID-19 vaccination providers to report potential COVID-19 vaccination fraud.

C) Risks to Australia regarding fraud and integrity of COVID vaccines in South Pacific nations and support for these nations to address issues relating to fraud and integrity risks

The Guild acknowledges that the Australian Government is providing support to South Pacific nations to facilitate access to safe and effective COVID-19 vaccine doses through participation in the COVAX Facility,⁷ as well as committing additional funding to ensure full immunisation coverage is achieved.⁸ This will help reduce the risks to Australia due to fraud and integrity of COVID-19 vaccines.

There is a need to monitor the security of vaccine delivery to South Pacific countries to prevent potential vaccine fraud, and safeguard against the potential diversion of Australian vaccines outside official channels. The Guild understands the Australian Government is currently helping in the efforts to deliver vaccines from Australia and other countries participating in the COVAX Facility, which is contributing to reducing the risk of vaccine related fraud, such as diversion of doses.

As Australia begins to open international borders, the risk of transmission of COVID-19 from other countries is likely to increase, particularly if the integrity of COVID-19 vaccines is not upheld. Full immunisation coverage in the South Pacific nations will be reliant on continuing to support access to safe and effective vaccine doses.

D) Physical security in the production, transport and supply of COVID vaccines in Australia

Community pharmacies are set up for managing the safe ordering and storage of restricted medicines for dispensing and supply to the Australian public. Pharmacies must meet strict state and territory regulatory requirements to ensure that the public does not have access to restricted medicines (i.e. medicines scheduled under the national Poisons Standard)⁹ and that the storage is such that the integrity and effectiveness of the medicine is not compromised. This includes meeting manufacturer requirements for medicines with special storage conditions, such as temperature sensitive medicines.

⁷ <https://www.health.gov.au/initiatives-and-programs/covid-19-vaccines/about-rollout/vaccine-agreements>

⁸ <https://indopacifichealthsecurity.dfat.gov.au/australian-support-covid-19-vaccine-access-pacific-and-southeast-asia>

⁹ <https://www.tga.gov.au/publication/poisons-standard-susmp>

Community pharmacies play their part in the vaccine supply chain by ensuring that Government mandated protocols for vaccine stock acquisition, receipt and storage are rigorously followed. As stated in the committee's Interim Report, supply arrangements for COVID-19 vaccines in Australia are currently being managed by the Australian Government Department of Health.

Community pharmacies participating in the COVID-19 vaccination rollout are one of the endpoints of the supply chain and provide an ideal environment for the safe supply of vaccines to consumers. COVID-19 vaccines are included in Schedule 4 of the Poisons Standard which requires pharmacies to store these medicines in a vaccine refrigerator that is located in an area of the pharmacy inaccessible by the public. The Guild is not aware of any community pharmacies reporting concerns regarding the physical security of COVID-19 vaccines stored at a pharmacy level or any breaches in physical security that have occurred.