

20th April, 2018

Dear TGA,

Re: Consultation regarding management and communication of medicines shortages

I would like to suggest that when shortages are reported, an estimation of the approximate duration of the shortage is also reported, especially when medicines can be reasonably substituted with alternative(s).

Once suppliers of alternatives are aware that another company is experiencing stock shortages, it is difficult for those alternative suppliers to know how to respond since lead times for ordering pharmaceuticals are typically 6 months.

- If the shortage is only brief, there is little the alternative suppliers can do other than try to expedite orders already in the system (such as switching from sea to air freight) and rely on stock on hand to cover additional demand.
- If the shortage is longer term, alternative suppliers can place additional orders for extra stock.

The choice of response depends on the alternative suppliers knowing in advance approximately how long the shortage will remain. Alternative suppliers are unlikely to risk ordering extra stock without the assurance that they will be able to sell it, especially if the stock has a limited shelf life. If alternative suppliers don't place additional orders and the shortage is long term, then the danger is that everyone goes out stock with the accompanying public health issues that this can cause.

Please note that I am employed by a pharmaceutical supplier but I have not sought my employer's opinions nor their permission to submit to this consultation. Hence, I request that my name and details NOT be made public.