



**AUSTRALIAN MEDICAL ASSOCIATION**  
(SOUTH AUSTRALIA) INC.  
ABN 91 028 693 268

4 January 2022

Angela FitzHenry  
Manager  
Legislation  
Medicines and Technology Programs  
Health.MTPP@sa.gov.au

Your Reference: A32319323

Dear Ms FitzHenry

**Re: Health Practitioner Regulation National Law (South Australia)  
(Telepharmacy) Variation Regulations 2022**

Thank you for your correspondence dated 6 December 2021 and the opportunity to comment on amendments to the Act which mainly refer to the advances in technology and modern approaches to health care provision.

The Committee of General Practice, within the Australian Medical Association in South Australia considered the proposed Telepharmacy Regulations and submits for your consideration the following:

Clarification is sought around Part 2 – Point 5 (c)

*'a pharmacy service may only be provided at the pharmacy while a pharmacist is not physically in attendance at the pharmacy if a pharmacist who is in attendance by means of Internet or other electronic communication is satisfied that there is a need for immediate provision of the service;'*

What are the criteria for the service requirement?

The type of service provided needs to be described in more detail.

Is this simply the provision of OTC medication / prescription item outside a schedule 8 medication or does it in fact include clinical advice in which case it would be seen as telehealth.

Thank you for the opportunity to provide this feedback. Please contact me at any time to discuss the issue raised in this letter by contacting EA Mrs Claudia Baccanello on 8361 0109.

Yours sincerely

A handwritten signature in black ink, appearing to read 'MA', written over a light blue horizontal line.

**Dr Michelle Atchison**  
BM, BS, FRANZCP, GDipArtHist, AMA(M)  
President

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