

The South African Pharmacy Council  
The Registrar and Head of Legal Services  
25 March 2020

Dear Sir and Madam

The recent recommendation made by SAPC “COVID-19 Infection Prevention Guidelines for the Pharmacy” in which it stated that pharmacy staff should be provided with masks and gloves is ill-advised and should be urgently rescinded; failing which there may be a severe impact on the availability of pharmacy services to the South African public during this time of crisis.

The Pharmacy First Working Group is of the view that the recommendation is ill advised for the following reasons:

- 1 The PPE recommended by the SAPC will have little or no impact on the safety of pharmacy staff or the public. Its efficacy is unproven, and doubted in the case of people that are not ill.
- 2 The masks are in short supply globally and stock which is available should be directed to medical staff treating critically ill patients and for the use by patients that have tested positive for Covid-19. By compelling pharmacies to purchase these masks for less critical or vulnerable staff, will result in masks will not being available for critical frontline medical staff and ill patients ,placing the health of frontline medical staff at greater risk, and will increase the risk of transmission by infected individuals.
- 3 The global shortage of this PPE means that a number of pharmacies will be unable to access and provide this PPE to their staff, even if they wanted to. The consequence of not providing this PPE, while the SAPC recommendation stands, is that some pharmacy staff members are refusing to work with out the recommended PPE, meaning that these pharmacies will close or be short-staffed. This will severely impact on vital pharmaceutical services in the face of a global humanitarian crisis.
- 4 If a pharmacy provides this PPE to its pharmacy staff, it will be morally compelled to make it available to its front shop staff. There would be no rational basis to discriminate between staff who work in the same shop. This will be particularly

onerous for grocers who have pharmacies in their supermarkets, but may be devastating for many small pharmacies who do not have the flexibility in their budgets to pay this increased expense.

- 5 The cost of providing this PPE has not been factored into the decision. There has been no increase in dispensing fees to cover this cost, and we doubt that a proper financial impact assessment was performed by the SAPC before publishing this recommendation.

If the intention of the SAPC is to protect pharmacy staff and the public, this recommendation does little to further that objective. The Pharmacy First Working Group has already drawn up a standard operating procedure to protect staff and customers, which has drawn on available medical and scientific understanding of the virus, international best practice and common sense to produce something which can be rolled out, and has in many instances already been implemented.

Whilst this is deemed to be a recommendation and guideline by the SAPC and not written into the GPP, the fact that this is issued by the Regulator, pharmacists and support teams in the pharmacies interpret this as a ruling. This has caused untold angst, confusion and disruption in the community pharmacy sector.

If the recommendation remains in place, then the SAPC must provide every pharmacy sufficient PPEs for use according to best practice protocols i.e. change the mask every 8 hours. Failing that, the SAPC must carry responsibility for every pharmacy that closes its doors because it is unable to comply, or its pharmacy staff is unwilling to tender their services.

Given the above concerns, the SAPC is called on to immediately withdraw the recommendation it made, or to re-write the guideline so as to accurately reflect the reality faced by pharmacists on the ground.

The following statements and references are quoted in support of the position taken by the Pharmacy First Working Group.

1. Wearing medical masks when not indicated may cause unnecessary cost, add to the procurement burden and create a false sense of security that can lead to neglecting other essential measures such as hand hygiene practices.

(Reference: International Pharmaceutical Federation. 2020. Coronavirus SARS-CoV-2 / COVID-19 pandemic: Information and Guidelines for Pharmacists and the Pharmacy Workforce. Page 18.)

2. Are medical masks effective in protecting me from infection?

Wearing a medical mask is one of the prevention measures to limit spread of certain respiratory diseases, including COVID-19, in affected areas. However, the use of a mask alone is insufficient to provide the adequate level of protection and other equally relevant measures should be adopted, including adequate hand hygiene and other infection control and prevention measures. (World Health Organization, 2020)

(Reference: World Health Organization. (2020). Coronavirus disease (COVID-19) advice for the public: When and how to use masks. Retrieved from <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public/when-and-how-to-use-masks> )

3. Employees with diseases that compromise their immune system should use masks and preferably perform back office tasks. Hand hygiene measures should be reinforced.

(Reference: International Pharmaceutical Federation. 2020. Coronavirus SARS-CoV-2 / COVID-19 pandemic: Information and Guidelines for Pharmacists and the Pharmacy Workforce. Page 13.)

