



November 2013

Ms Brigid Dohnt  
Director  
Immunisation Policy  
Department of Health  
GPO Box 9848 (MDP 13)  
Canberra ACT 2601

By email: [nic.ohp@health.gov.au](mailto:nic.ohp@health.gov.au)

Dear Ms Dohnt,

### **Development of the Australian Standard for Medical Refrigeration Equipment – For the storage of vaccines**

Thank you for the opportunity for the Australian Primary Health Care Nurses Association (APNA) to provide input to the draft *Australian Standard for Medical Refrigeration Equipment – For the storage of vaccines*.

APNA is the peak professional body for nurses working in primary health care including general practice. With more than 3500 members, APNA provides primary health care nurses with a voice, access to quality continuing professional development, educational resources, support and networking opportunities.

APNA continually strives to increase awareness of the role of the primary health care nurse, and to be a dynamic and vibrant organisation for its members.

We are providing this written submission to ensure that the views of primary health care nurses are considered.

### **APNA support for the proposed standard**

Primary health care nurses working in general practice and other settings play a major role in immunisation in Australia. APNA supports the development of an Australian standard for medical refrigeration equipment, to help ensure the delivery of quality immunisation services.

As the vast majority of refrigeration equipment used in Australia is manufactured off-shore, with varying degrees of reliability, the implementation of a standard is imperative to ensure patient safety and to preserve valuable vaccines and medication.



Many general practices do not have purpose-built vaccine fridges. *Strive for 5* guidelines and the *Australian Immunisation Handbook* list domestic fridges as sufficient, which imposes no need on practice owners to install purpose-built vaccine fridges. Until there is a national standard many owners will continue to use domestic refrigerators such as bar fridges, which are notoriously unreliable.

Use of inadequate equipment is widespread, and APNA supports a standard that applies to newly manufactured refrigeration equipment for the storage of vaccines.

### **Key matters to be included in the proposed standard**

APNA recommends this standard stipulates that upon replacement due to ordinary wear and tear, a new vaccine fridge meets the requirements of the standard.

We are pleased to see the draft supports the annual calibration of vaccine fridges, in the same way sterilisers require calibration.

APNA also supports that this standard should apply to hospitals and acute facilities that store vaccines.

### **Costs of implementing the proposed standard**

While there will be a cost to general practices to implement this standard, practices do benefit financially from the flowthrough of patients receiving bulk-billed vaccines. The MBS needs to appropriately cover costs in line with the Government's commitment to universal access to primary health care for Australians.

APNA requests however that the government more clearly articulate how it intends to subsidise the cost of minimum requirements for medical refrigeration in general practice and primary health care.

A regulatory impact statement should be prepared to assess the financial and other burdens on primary health care and general practice.

### **Other strategies to support cold chain adherence**

Ultimately, while a purpose built-fridge helps mitigate against cold chain breaches much more efficiently and effectively than a domestic fridge, even with purpose-built units we still witness poor cold chain management and risk to patient safety.

This standard, in its draft form, aims to assist general practices to make informed choices but it also imposes conditions, such as annual testing and validation, that are incorporated by default in cold chain monitoring.



The RACGP *Standards for general practice (4th edition)* cover most likelihoods concerning vaccine management for general practice, and they also refer, as essential references, to the *Australian Immunisation Handbook* and *Strive for 5* guidelines.

Nurses working in general practice and primary health care are well trained and highly familiar with cold chain and vaccine management.

What needs to be addressed are knowledge gaps among many clinicians about the importance of cold chain and the consequences of cold chain breach when it is not rectified or acknowledged. Cold chain breach is more than just wasted vaccines and wasted money. As health practitioners it is our moral responsibility to ensure the patient's safety is ensured first and foremost.

Understanding and adhering to good cold chain procedure is vital, and this requires not only appropriate guidelines and standards, but also good training and ongoing education.

Thank you for the opportunity to comment, and I hope this submission is helpful.

Yours sincerely,

A handwritten signature in black ink that reads 'Julianne Badenoch'. The signature is written in a cursive, flowing style.

**Julianne Badenoch**

President, APNA



## **About APNA**

The vision of the Australian Primary Health Care Nurses Association (APNA) is for a healthy Australia through best practice primary health care nursing.

APNA is the peak professional body for nurses working in primary health care including general practice. With more than 3500 members, APNA provides primary health care nurses with a voice, access to quality continuing professional development, educational resources, support and networking opportunities.

APNA continually strives to increase awareness of the role of the primary health care nurse, and to be a dynamic and vibrant organisation for its members.

Primary health care nursing is wide ranging and covers many specialist areas including general practice, Aboriginal health, aged care, occupational health and safety, telephone triage, palliative care, sexual health, drug and alcohol issues, women's health, men's health, infection control, chronic disease management, cardiovascular care, immunisation, cancer, asthma, COPD, mental health, maternal and child health, health promotion, care plans, population health, diabetes, wound management and much more.

APNA aims to:

1. Support the professional interests of primary health care nurses
2. Promote recognition of primary health care nursing as a specialised area
3. Provide professional development for primary health care nurses
4. Represent and advocate for the profession
5. Collaborate with other stakeholders to advance our mission
6. Ensure a sustainable and growing professional association, by and for primary health care nurses.