MALTA CHAMBER OF PHARMACISTS
Kamra tal-Ispiżjara ta' Malta
EST. 1900

**Sottomissjoni tal-Kamra Tal-Ispizjara Ta' Malta lill-Kumitat Kongunt tal-Kumitati Parlamentari dwar il-Familja, Sahha u Affarijiet Socjali. - 25/07/2016**

Nirringrazzjaw tal-istedina.

Il-Kamra hija l-assoccjazzjoni professjonali li tirrapprezenta l-ispizjara, li jipprattikaw f'diversi setturi, il-maggjoranza fil-kommunita.

Il-professjoni farmacewtika hija ibbazzata b'mod qawwi fuq ix-xjenza.

Il-Kamra xandret il-pozzizzjoni taghha dwar l-*emergency contraception* (EC) b' zewgt stqarrijiet, b'risposta ghal xi mistoqsijiet minn settur tal-medja, u biex tkun ta' gwida ghall-ispizjara.

Gejna ikkwotati parzjalment, f'petizzjoni minn-entita lill-MPs – u hrigna korrezzjoni. (www.spizjara.org website tal-Kamra)

*A priori*, nghid li mhux ir-rwol tal-Kamra li tidhol fil-mertu ta' ghandhiex tigi licenzjata jew le l-*Emergency Contraceptive Pill* (ECP). Dawn il-prodotti medicinali huma ga registrati fl-Unjoni Ewropea. Dan huwa ir-rwol tal-Awtoritajiet Kompetenti u il-Gvernijiet.

L-ispizjara huma professjonisti fil-kura tas-sahha, jifformulaw opinjoni ibbazata fuq tlett kriterji: ix-xjenza *'evidence based'* kif ippublikata f' *'peer reviewed journals'*; id- dokumenti tal-Awtorita Kompetenti li huma s-*Summary of Product Characteristics* (SPC's) u x'tghid l-industrija farmacewtika. L-ispizjara huma wkoll iggwidati mill-kodici tal-etika mahrug mill-Kunsill Farmacewtiku.

Innotajna dak li qal is CEO tal-Awtorita tal-Medicini dwar l-updating tal- SPC's tal-prodotti li ghandhom il-*levonorgestrel* u l-*ulipristal*. Jekk dawn il-prodotti medicinali jintuzaw skond il-'*label*', kif qal ukoll Prof. Mark Brincat fis-seduta tal-erbgha li ghaddiet u skond kif jindika l-'*Marketing Authorisation Holder*' (MAH), skond l-SPC, wiehed jikkonkuldi li huma jaggixxu bhala kontraccettivi, fil-fazi 'pre-ovulatorja'.

Jekk wiehed jiskrutinja il-'*body of knowledge*', l-artikli xjentifici ippubblikati fil-'*peer reviewed journals*', specjalment dawk ippubblikati dawn l-ahhar 10 snin, jidher li ghad hemm dibbattitu dwar li wiehed jistghax jikkonkludi li l-*ulipristal* partikolarment, jistgha jkun li ghanda effett post-ovulatorju, post-fertilizzazzjoni:

Hawnhekk ma ghandhiex il-hin nidhlu f'dettal izda nistghu nirreferukhom ghall-zewgt '*systematic reviews*' ta':
Trussel et al http://ec.princeton.edu/questions/ec-review.pdf li rreferejna ghaliha fl-stqarrijiet tal-Kamra; u
Rosato et al (Frontiers in Pharmacology;http://www.ncbi.nlm.nih.gov/pmc/articles/PMC4709420/), it-tnejn ippubblikati fil -2016 u 2015 rispettivament fost publikazzjonijiet li ikkonsultajna. Dawn ghamlu review ta' 191 u 54 papers rispettivament.

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Rosato et al qalu "*it should be pointed out that the exact mechanism of action of UPA is not completely clarified. In particular it is still poorly understood when it acts as agonist or antagonist of progesterone. Knowledge of its precise mechanism of action would be helpful to better understand its effects on target organs*."

Fost il-papers li jirreferu ghalihom Rosato et al, fis-*systematic review* taghhom, hemm wahda ta' Stratton et al li qalu hekk:
*"the administration of "10–100 mg ulipristal acetate also results in a reduced endometrial thickness, delayed histological maturation, coupled with alterations in progesterone-dependent markers of implantation, which may subsequently inhibit implantation by rendering the uterus less receptive to the trophoblast*."(Stratton P, Levens ED, Hartog B, Piquion J, Wei Q, Merino M, et al. Endometrial effects of a single early-luteal dose of the selective progesterone receptor modulator CDB-2914.Fertil Steril. 2010;93:2035–41. [PMC free article] [PubMed])

Dwar ir rwol tal-ispizjara fl-EC - ghandhom rwol importanti fir-rigward ta' l-iddispensar tal-EC - ninnotaw li EC hija bla ricetta fil-maggoranza tal pajjizi fl-UE. Ma ninsewx li qieghdin nitkellmu dwar *emergency contraception*.

Hija '*pharmacy medicine*' jigifieri tinghata bl'intervent tal-ispizjar… hemm (per ezempju fl-UK) fejn l-ispizjar ghandu protocol x'isegwi biex jassigura kemm jistgha jkun li l-EC tintuza skond il-label; jaghti informazzjoni neccessarja u ezatta lil-mara; jigbed l-attenzjoni ghall-kontraindikazzjonijiet, interazzjonijiet possibbli ma xi medicini li wahda tkun qieghda tiehu; side effects serji u jiddecidi meta ghandu jirreferi lil tabib.

Huwa importanti li joffri edukkazzjoni dwar '*sexual u reproductive health*', li dawn il prodotti huma ***emergency*** *contraception* u mhux ghall uzu kontinwu ghall-kontraccezzjoni per ezempju.

Il-Kamra temmen, kif intqal ukoll fl-ewwel seduta, li hemm bzonn ta' edukazzjoni sa fuq. Huwa rwol tal-Kamra li tara li jsiru sessjonijiet ta' Continuing Professional Development (CPD) ghall-membri taghha f'dan ir-rigward.

Il-Kamra tishaq li l-ispizjara bhala professjonisti indipendenti fil-kamp tas-sahha ghandhom id-dritt ghall *'conscientious objection'* minhabba f'konvinzjonijiet morali jew religjuzi, izda minghajr ma jaghmlu gudizzju min dak li jkun jew li jimponu il-konvinzjonijet taghhom fuq haddiehor. Anzi huma ghandhom jinfurmaw minn fejn jistghu jiehdu is-servizz minn spizeriji ohrajn.

L-Kamra tiggwida lil-ispizjara li ghandhom jibbazaw il-prattika taghhom b'dan ir-rigward wara li jifformaw l-opinjoni taghhom ibbazata fuq ix-xjenza recenti.

Note:
The resolution 1763 (http://assembly.coe.int/nw/xml/News/FeaturesManager-View-EN.asp?ID=950) adopted on October 7th, 2010 by the Council of Europe Parliamentary Assembly explicitly states that: "No person, hospital or institution shall be coerced, held liable or discriminated against in any manner because of a refusal to perform, accommodate, assist or submit to an abortion, the performance of a human miscarriage, or euthanasia or any act which could cause the death of a human foetus or embryo, for any reason." Hence, the right to conscientious objection in lawful medical care shall be respected by all the CoE member states. Moreover, neither European Convention of Human Rights nor Article 11 in particular confer a right to abortion.

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International Pharmacy Federation (FIP), Commonwealth Pharmaceutical Association