

Mr Paul Creech
Assistant Secretary
Pharmaceutical Policy Branch
Department of Health
GPO Box 9848
CANBERRA ACT 2601

Dear Mr Creech

Public Consultation on the Post-market Review of Authority Required PBS Listings

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide input into the Department of Health's *Public Consultation on the Post-market Review of Authority Required PBS Listings (the Review)*.

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

As such, CHF is supportive of review of authority required medicines currently on the PBS, as it will potentially be valuable in ensuring that publicly-subsidised medicines continue to be accessed and used appropriately and cost-effectively. We welcome the Review's aim to assess and simplify current prescribing processes of authority required drugs for the benefit both patients and doctors.

CHF and its members have a strong interest in the availability of medicines to Australian consumers through the PBS. Of significant and ongoing concern to consumers are the delays they face in affordable access to essential medicines as a result of the regulatory burden of the Authority required process. There are currently 447 medicines on the PBS which can only be prescribed with specific approval from the Department of Human Services.

CHF notes and broadly supports the terms of reference of the Review which aims to assess the criteria used by the PBAC to determine if a medicine should be recommended as Authority Required and also to systematically review the current listings according to the proposed criteria to ensure this is applied consistently to all PBS Authority listed medicines.

However in assessing the criteria for current and future listing of authority required medicines, **CHF recommends that the Review consider and actively seek consumer perspectives as critical input and evidence.**

As the ultimate end users of medicines, consumer must be encouraged to share their experience with medicine. In CHF consultations, consumers have strongly expressed that the current system does not appear to reflect the way in which consumers use and medicine experience and that this ends up limiting the overall effectiveness of pharmaceutical therapies. While we support the Review's objective to deliver quick benefits to doctors and other prescribing health professionals, along with pharmacists and other dispensers, these benefits cannot be delivered at the compromise of consumer-centred care.

As identified in our recent submission to the ongoing Post market reviews of PBS medicines such as Asthma and Diabetes, CHF is concerned that the Review's consultations and assessments are focused on cost savings and clinical evidence and do not include adequate consumer input and perspectives. CHF believes that current Review mechanisms do not adequately capture the rich evidence base provided by qualitative experiences of consumers using these medicines, such as the overall impact of medication on quality of life.

The importance of consumer input in discussion and reviews related to medicine and therapeutic policy has been recognised and consumer input is now an expected part of policy development. While CHF welcomes and supports the robust and comprehensive mandate of these reviews, we are concerned this consultation will end up being dominated by clinicians, prescribers and industry stakeholders that often interpret and filter the information provided by consumers in a way which does not accurately reflect consumer experience.

Safety, quality and access are key consumer issues that should be taken into consideration when determining the funding and ongoing delivery arrangements of authority required drugs, and CHF recommends that consumer perspective in this area be given appropriate and balanced consideration through the Review process.

CHF appreciates the opportunity to provide a submission to this consultation, and looks forward to ongoing participation in the Review. If you would like to discuss the issues raised in more detail, please contact CHF Policy Officer, Priyanka Rai.

Yours sincerely

Adam Stankevicius
Chief Executive Officer
16 June 2014