

28 October 2015

A/ GPO Box 1491
Sydney, NSW 2001

P/ 02 9222 6200

F/ 02 9221 0438

E/ TSANZoffice@thoracic.org.au

W/ thoracic.org.au

COPD Review Secretariat

Via Email: PBSsubmissionsPMR@health.gov.au

To Whom it may Concern

Re: Consultation on Draft Terms of Reference - Post-market Review of Chronic Obstructive Pulmonary Disease (COPD) Medicines

The Thoracic Society of Australia and New Zealand (TSANZ) thank the Department of Health for seeking feedback on the Terms of Reference for the Post Market Review of COPD Medicines. In our submission in relation to the PBAC application for vilanterol/umeclidinium we highlighted concerns about the proliferation of COPD and asthma treatments and offered to work with other parties including NPS Medicine Wise as appropriate to address the easily foreseeable problems.

The TSANZ mission is to lead, support and enable all health workers and researchers who aim to prevent, cure and relieve disability caused by lung disease. TSANZ is the only Peak Body in Australia that represents all health professionals working in all fields of respiratory health. As such, we provide the Australian Government with the opportunity to have access to a primary point of professional expertise and highly credible engagement with respiratory health care specialists in all disciplines across Australia.

TSANZ has a membership base of approximately 1400 individual members from a wide range of health and research disciplines and has a database of approximately 3000 contacts. TSANZ is the leading provider of evidence based guidelines for the treatment of respiratory disease in Australia, undertakes a large amount of professional education and training, is responsible for significant research administration and coordinates an accredited respiratory laboratory program.

The TSANZ, together with the LFA, have developed and maintained the COPD-X guidelines that play a central role in COPD management in Australia. Whilst TSANZ welcomes this review we are disappointed that we were not given more notice so as to consult more widely with our members on the Terms of Reference. We would also question the timing of the review with respect to sufficient data being available for some of the products which are relatively new to the market.

TSANZ members report significant confusion regarding combination LABA/LAMA therapy with the current situation of multiple inhalers with confusing names and lack of clarity around their mechanism of action resulting in the possibility of less than optimal patient outcomes and unnecessary cost to the health system.

TSANZ would like to see the terms of reference be expanded to include the following:

- A primary focus on the quality use of medicines rather than on cost savings as the former will achieve the savings
- Evaluation of the evidence for therapy in asthma and COPD along with identification of potential risks of therapy in this comorbid situation e.g. the risks associated with unopposed

A member of

LABA without inhaled corticosteroids in asthma-COPD overlap or the risks of β -blocker use in this group of patients.

- With respect to item 5 ' Analyse the current utilisation of PBS listed COPD medicines to identify the extent of co-prescribing and use that is inconsistent with clinical guidelines and/or PBS restrictions. Evaluate if the current utilisation of multiple therapies and the latest evidence relating to safety and efficacy justifies a review of cost-effectiveness for some or all medicines indicated for COPD', include a similar analysis of co-prescribing for hypertension, in order to evaluate whether this is a common problem in conditions with multiple similar drugs, or if it is a problem restricted to inhaled therapies. This information will be crucial to designing interventions to address the problem.

TSANZ received an invitation to nominate representatives to participate in an expert Reference Group for the Post-market Review of COPD Medicines (the Review). TSANZ welcomes this opportunity and will nominate representatives to work with the department on the Review.

Sincerely,

Prof Peter Gibson

President of the Thoracic Society Australia and New Zealand (TSANZ)