



BETTER ACCESS
— AUSTRALIA —

13 February 2022

The Hon. Scott Morrison MP
Prime Minister
Parliament House
Canberra ACT 2600
Email: dlo@pm.gov.au

Dear Prime Minister

Urgent Intervention Required on National Medicines Policy Review and clarification of your Government's intended disinvestment policy for Australia's PBS

Better Access Australia is asking you to halt the rushed review of Australia's National Medicines Policy and immediately clarify that it is not your Government's intention to pursue a policy of disinvestment in the community's access to medicines on the Pharmaceutical Benefits Scheme (PBS).

As part of your 2019 election commitments, alongside [reducing the cost of medicines access on the PBS](#), you also committed to undertaking a comprehensive review of the National Medicines Policy - a pillar of Australia's health system. Your Government committed to commence this review within nine months of being elected but this was delayed until September 2021 as a result of COVID-19.

In an effort to complete the Review prior to the next election, it is being conducted internally by the Department of Health via a rushed process resulting in the disenfranchisement of the community. As the attached chronology identifies, a long delay in commencement, short timeframes once commenced, refusal to make information public, lack of genuine consultation, and most importantly virtually no recognition of the community's input and priorities for this policy. This has culminated in the issuance of a revised draft document on 2 February that has left those who contributed to the 156 written submissions aghast. The Review teams' consultation on this document on 9 February reaffirmed this concern and has left many in the community angry.

It is not only the lack of recognition of the community's request for the NMP to acknowledge that patient access – both in time to access and cost of access is an integral principle for them – but it is the emergence and dominance of what appears to be a new Government initiative to remove access to medicines and technology as part of the revised policy.

The 9 February webinar affirmed for stakeholders that this process is dominated by the Review team's desire to entrench disinvestment, budget constraints and the autonomy of the system over patient need. Patients and consumers of medicines were once again instructed it is not a public health system and they do not own this policy. The administrators of the PBS do. Medicines access is more than the PBS, and more than health technology assessments being cost-recovered.

Statements by the Review team that improving timeliness of subsidised access to any medicine, vaccine or therapeutic were not feasible as the system cannot improve or adapt, show an unwillingness to learn from the better practice of other countries, and almost a pride in our average of 820 days between ARTG registration and subsidised access to a medicine on the PBS. This is not acceptable.

Despite pressure from multiple stakeholders the Minister for Health has still only given the community until 2 March to comment on the draft policy despite its almost complete setting aside of the 156 submissions made to the Review.

The majority of groups participating in this Review work on thin budgets, relying on the hard work of volunteers and are trying to participate in this formative health policy in amongst budget submissions, MSAC cost recovery reviews, PBAC agendas for consumer comments, and a multitude of other health and social services consultations. They don't have a department of 5,000 employees.

Never has the community's contribution to a Review been more important.

This is Australia's public health policy. It is not the Review team's nor government's to rush. And a policy that intends to cut access to medicines needs more time than a tick and flick process.

We commend the Government for its preventive health strategy and other high level policy development for the future of Australia's health, but we cannot support this NMP Review process.

Better Access Australia is asking you to immediately intervene to stop this NMP Review and direct that a new process involving an independent Review team with new patient-centric terms of reference be established after the election. This will enable the new Review team to consider the submissions to date and commence a consultation that is genuine and informed by the social compact that is our medicines access system – a public health program.

The Minister for Health regularly cites Labor's 'deferrals' policy in 2011 as a stark comparator to your Government's own approach to the PBS. The Community needs to know right now if this 'disinvestment' initiative in the draft NMP is a new policy position of your Government.

Therefore, we are asking you to urgently and publicly confirm whether the Government is about to introduce a program to cut access to PBS medicines as part of the forthcoming 2022-23 Budget?

Pending advice of your intervention, *Better Access Australia* is participating in an urgent response initiative being organised by the Consumer Health Forum and Medicines Australia to help stakeholders challenge the disregard of the NMP Review process and consumer input. We thank CHF and MA for resourcing this work for the broader community.

Yours sincerely,

Felicity McNeill ^{PSM}
Board Chair

Helen Innes
Board Member

David Mackay
Board Member

CC: The Hon Anthony Albanese MP, Leader of the Opposition
The Hon Greg Hunt MP, Minister for Health
The Hon Mark Butler MP, Shadow Minister for Health and Ageing
Ms Clare O'Neil MP, Acting Shadow Minister for Health and Ageing

ATTACHMENT A: Chronology of Review

**Better health, disability and social services.
Better Access Australia.**

CHRONOLOGY OF NATIONAL MEDICINES POLICY REVIEW

Date	Event
April 2019	<ul style="list-style-type: none"> Morrison Government re-elected
29 Jan 2020	<ul style="list-style-type: none"> Selected groups invited to meeting in Canberra with Minister Hunt to comment upon and draft Terms of Reference
24 June 2021	<ul style="list-style-type: none"> Internally run NMP Review to commence in August Committee announced including being chaired by Deputy CMO Will be completed by early 2022
02 Sept 2021	<ul style="list-style-type: none"> Call for input to review Five-week deadline to 8 Oct 2021 (compares to three months for TGA and other health policy consultations) Those who know to ask for an extension granted until 17 October
07 Oct 2021	<ul style="list-style-type: none"> BAA writes to Minister and asks him to publicly extend the timetable for the provision of input. (No response received)
17 Oct 2021	<ul style="list-style-type: none"> Secret second date for submission of input
Oct -Nov 2021	<ul style="list-style-type: none"> Groups contacted to participate in webinars
03 Nov 2021	<ul style="list-style-type: none"> Dept confirms NMP Submissions will not be made public BAA asks Minister to publish submissions (No response received) BAA sets up submission access website
04 Nov 2021	<ul style="list-style-type: none"> Medicines Australia calls for submissions to be made public
01-15 Nov 2021	<ul style="list-style-type: none"> Review Team holds webinars with small groups Advises they intend to now publish submissions – no date provided Advises NMP will be an update not first principles review Advises separate advice will also be provided to Minister on ‘other matters’
09 Dec 2021	<ul style="list-style-type: none"> Review team provides summary of what they consider was contained in the 156 submissions Reaffirms NMP will only be an update not first principles review and there will be no ‘vision statement’ Advise that the draft policy will be provided to the community for comment and the review process has been extended to accommodate this change. Draft policy to be provided in February with final report by end of March before the election
21 Jan 2022	<ul style="list-style-type: none"> Save the date issued for webinar of 9 Feb
22 Jan 2022	<ul style="list-style-type: none"> 120 of 156 submissions to NMP review released on consultation hub
02 Feb 2022	<ul style="list-style-type: none"> Draft NMP released on PBS website with 2 week deadline for input (16 Feb) but not notified to those that contributed to the Review
03 Feb 2022	<ul style="list-style-type: none"> Review team emails those that contributed to the Review with the draft document ahead of meeting date of 9 Feb BAA asks Minister for urgent extension to mid-March for consumers and mid-June for review completion. Seeks support from Opposition given election timing
05 Feb 2022	<ul style="list-style-type: none"> Medicines Australia and the Consumers Health Forum ask for time extension for the review
07 Feb 2022	<ul style="list-style-type: none"> Opposition calls for better processes and consultation on NMP review
08 Feb 2022	<ul style="list-style-type: none"> Department advises media Minister has extended consumer timeframe to 2 March
09 Feb 2022	<ul style="list-style-type: none"> Webinar with review team and all stakeholders Review team confirm no extension to timeframe for completion of Review – still end of March
10 Feb 2022	<ul style="list-style-type: none"> CHF and MA invite stakeholders to be part of a forum in week of 14 February