



The Hon Greg Hunt
Minister for Health
Parliament House
Canberra ACT 2600
E: Greg.Hunt.MP@aph.gov.au

19 November 2021

Dear Minister

RE: NATIONAL HEALTH AMENDMENT (ENHANCING THE PHARMACEUTICAL BENEFITS SCHEME) BILL

We are writing on behalf Harm Reduction Australia to request your immediate attention on the possible unintended consequences of the current National Health Amendments (Enhancing the Pharmaceutical Benefits Scheme [PBS]) Bill before the Parliament.

Our concerns relate specifically to access to medicines on the PBS Opioid Dependence Treatment Program (ODTP) as it is our understanding that the Bill currently before the Parliament delivers significant savings over five years to the PBS via price reductions.

HRA certainly supports reduced prices for medicines that translate into savings for the PBS and consumers. The Bill currently under consideration, however, raises a number of serious concerns for HRA which we would like to bring to your attention and would welcome your advice upon. Specifically, our concerns include:

1. The Bill (as currently drafted) could unfairly target ODTP medicines with large price cuts and result in the companies involved in the production of ODTP medicines re-assessing the viability of bringing their medicines to this market. The worst-case scenario being they withdraw from the market leaving consumers of the ODTP, who are in treatment for drug dependence issues, at severe risk.
2. The impact of the Bill on the Post Market Review on ODTP medicines which, as you are aware, is currently underway and is charged with considering a range of issues in relation to access to these medicines.
3. The impact of the new (and recently listed) slow-release products being treated in the same manner as listed medicines of 15 years standing, thus potentially stifling any future innovation in this area.
4. The lack of consumer consultation in the preparation and finalisation of the Bill particularly given its potential implications outlined above, and in particular, what the Bill could mean for patients and their ongoing access to ODTP medicines.

We look forward to your advice on these concerns outlined above.

HRA is also aware that, as Health Minister, you understand how important it is to ensure that some of the most marginalised people in our community are not further disadvantaged and adversely impacted by having their access to these crucial medicines, that are all listed on the World Health Organisation List of Essential Medicines, further restricted.

We thank you again for your tireless efforts in difficult times and if there is a way HRA can assist you or your Department on this matter please do not hesitate to contact us.

Yours sincerely



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