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Ms Apolline Kohen
Committee Secretary
Community Affairs Legislation and References Committees
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Dear Ms Kohen

Health Legislation Amendment (Prescribing of Pharmaceutical Benefits) Bill 2025

The Australian Medical Association (AMA) welcomes the opportunity to comment on the proposed amendments to the *National Health Act 1953*, which would allow registered nurse (RN) prescribers to prescribe certain medicines under the Pharmaceutical Benefits Scheme (PBS).

The AMA has previously outlined¹ our recommendations and concerns during the consultation held by the Nursing and Midwifery Board of Australia (NMBA) and the Australian Nursing and Midwifery Accreditation Council (ANMAC) for the Designated Registered Nurse Prescriber Registration Standard, which came into effect on 30 September 2025. During the NMBA/ANMAC consultation, the AMA consistently advocated for safeguards around RN prescribing to ensure patient safety is upheld. This is reflected in the key requirements for RN prescribing in the registration standard, including specific qualifications and accreditation aligned with the required competencies, a robust baseline of clinical experience, clinical mentorship with an authorised health practitioner, and a prescribing agreement.

Since then, we have communicated to the NMBA outstanding issues with the registration standard that are still unaddressed, and we remain committed to work with them on these issues to avoid unintended consequences.

The AMA notes the proposed Amendment Bill does not fully address a concern we raised previously on the ambiguity around the definition of an authorised health practitioner. One of the criteria for approval requires the nurse prescribing agreement to be established with one or more PBS prescribers. However, this does not preclude the inclusion of other non-medical practitioners in the future, such as pharmacists or podiatrists (these were in fact suggested by others during the NMBA/ANMAC consultation). It is the AMA's strong view that supervising prescribers need to be extensively experienced in broad prescribing, and only medical practitioners and nurse practitioners (acting within their scope of practice) are suitably qualified.

1. <https://www.ama.com.au/ama-rounds/3-october-2025/articles/securing-safeguards-rn-prescriber-registration-standard>

The Amendment Bill also needs to provide stronger safeguards for the prescribing of dangerous medication. Although the prescriber agreement limits the pharmaceutical benefits a RN can prescribe (to match their PBS prescriber), the AMA asserts that Schedule 8 medicines should be excluded entirely. These drugs have a high potential of misuse and are under much stricter regulation than other scheduled medicines.

The AMA continues to support reforms that improve access to quality healthcare for all Australians, but firmly asserts a medically-led, collaborative, and patient-centred model of care is essential to our health system.

Thank you for your attention to the issues we have raised.

Yours sincerely

Dr Danielle McMullen
President