

Submission from Elizabeth Mary Graham
to
the Senate Finance and Public Administration References Committee
inquiry into
the Government's administration of the Pharmaceutical Benefits Scheme
(PBS),

July 2011

This submission is made as a private citizen with particular reference to the deferral of listing of Pharmaceutical Benefits Advisory Committee (PBAS) recommended medications on the Pharmaceutical Benefits Scheme. I thank the committee for the opportunity to make this submission. As a user of one of the deferred medications my comments are in relation to items a, b, d, e and f of the terms of reference for this inquiry.

a) the deferral of listing medicines on the PBS that have been recommended by the Pharmaceutical Benefits Advisory Committee

It was with great disappointment that I became aware of the non-listing of several medications earlier this year. These medications had already undergone the rigorous review of the Government's own PBAS committee. I understand that this committee is made up of independent clinical experts whose advice has been ultimately accepted in the past by the government. The deferral of listing of certain drugs over others, adds a layer of questionable review by cabinet supposedly on the basis of financial considerations, before their being made available at reasonable cost to the Australian citizens requiring them.

b) any consequences for patients of such deferrals

The deferral of the listing of these medications means the burden of cost remains with patients who need them. In my own case, the monthly cost of treatment by medication is considerable; the need to continue with an efficacious medication which is unlisted adds to my burden. While I can afford it, I will continue with its use, but fear the time will come when my financial

situation will make it necessary to change to a PBS listed medication. Should this scenario become reality, I will be forced to use other medications to counteract the side effects of the PBS listed medication; this is a situation of false economy as additional medications will be those listed on the PBS. I am certain I am not alone in facing this situation.

d) any impacts on the future availability of medicines in the Australian market due to such deferrals

Deferral of the listing of medications places at risk their continued viability as a marketable product in the Australian environment. Their non-listing restricts their use by all patients for whom they would be suitable and thus limits the prescribing of them by medical practitioners. This in turn either reduces the incentive for their continued production for a limited market or increases the cost for those using the medication. There is a lack of equity for all patients in this situation. It is my understanding that equity for patients has been an important element of the PBS since its inception.

*e) the criteria and advice used to determine medicines to be deferred and
g) the consultation process prior to a deferral.*

Since the deferral of the listing of medications, I have tried in vain to establish either the criteria used for determining which medications were listed and which were not, or the process of consultation at the time. The process of consultation and decision making is not transparent to the public and in particular, to patients for whom the medications are necessary. Lack of transparency can lead to rumour and suspicion and possibly unfair criticism of the decision makers. Lack of transparency also leaves the patient in need without redress, without a sense of equity and without confidence that there is scientific rationale behind the decision making process.

In conclusion, I am concerned that the current Federal Cabinet has introduced an additional phase in the approval of PBS drugs based solely on spurious considerations which lack transparency. The previous proven process was undertaken through scientifically based expert opinion. I believe that the

Government should revert to the previous process, beneficial to the Australian public.

Elizabeth Graham

July 14, 2011