



Apolline Kohen
Committee Secretary
Standing Committee on Community Affairs
Legislation Committee

30 January 2026

Dear Committee Members

Thank you for the invitation to make a submission to the Standing Committee on Community Affairs regarding the proposed changes to the Health Legislation Amendment (Prescribing of Pharmaceutical Benefits) Bill 2025, which would enable nurse prescribers to prescribe certain pharmaceuticals under the Pharmaceutical Benefits Scheme (PBS).

The Rural Doctors Association of Australia (RDAA) is the peak national body representing the interests of doctors working in rural and remote areas across Australia, and the patients and communities they serve. RDAA's focus is on improving access to safe, high-quality health services, particularly for people living in rural and remote communities classified as Modified Monash Model (MMM) 3–7.

RDAA has consistently supported multidisciplinary team-based models of care, as described by the World Health Organisation, to enhance the provision of primary care services, where those models are underpinned by four key pillars associated with improved health outcomes:

- *First contact accessibility* creates a strategic entry point for and improves access to health services.
- *Continuity* promotes the development of long-term personal relationships between a person and a health professional or a team of providers.
- *Comprehensiveness* ensures that a diverse range of promotive, protective, preventive, curative, rehabilitative, and palliative services are provided.
- *Coordination* organizes services and care across levels of the health system and over time.

- ***People-centred*** care ensures that people have the education and support needed to make decisions and participate in their own care.

In addition, RDAA recognises and values the skills and experience of our rural and remote nursing colleagues, particularly Remote Area Nurses and Rural and Isolated Practice Registered Nurses (RIPERNs). This nursing workforce has, for many years, worked collaboratively with rural and remote doctors to provide primary care and medications to patients through standing orders and approved primary care manuals, such as the CARPA Standard Treatment Manual.

With the *Registration standard: Endorsement for scheduled medicines – designated registered nurse prescriber* coming into effect from 30 September 2025, it is important that the broader Australian health care system aligns to support this change. RDAA therefore supports the proposed legislative amendments to enable access to the PBS. Without access to the PBS, nurse-prescribed medications would only be available to patients who are able to afford to pay privately.

RDAA believes that the rural and remote context provides a strong foundation for registered nurses to work collaboratively with authorised prescribers, and that this context should guide the development of appropriate local arrangements.

Access to the PBS also ensures appropriate system-level accountability for designated registered nurse prescribing, enabling nurses to work to their full scope of practice.

Throughout the Scope of Practice Review, medical practitioners were often subject to unfair criticism for not supporting members of the multidisciplinary team to work to their full scope of practice. However, RDAA identified that this was frequently due to system limitations. While certain clinicians may be permitted to undertake expanded clinical activities, accountability within hospital medical records, the PBS and the Medicare Benefits Schedule often rests with the medical practitioner's prescriber number, provider number or name. This creates a significant level of accountability for the provision of care and associated clinical decision-making. In this context, it is reasonable and appropriate for medical practitioners to question or reassess a patient where they are not fully confident in the assessment or proposed treatment plan.

If you have any additional questions in relation to RDAA's submission outlined in this correspondence please do not hesitate to contact RDAA Chief Executive Officer Peta Rutherford at ceo@rdaa.com.au

Yours sincerely

Dr Sarah Chalmers
President