

Dear Inquiry Chair,

Re: Inquiry: The Health Legislation Amendment (Prescribing of Pharmaceutical Benefits) Bill 2025

Thank you for the opportunity to provide a submission and for accepting this personal submission to the inquiry.

I note the Health Legislation Amendment (Prescribing of Pharmaceutical Benefits) Bill 2025 and the proposal to amend the National Health Act 1953 and the Health Insurance Act 1973 to enable nurse prescribers to prescribe certain pharmaceutical benefits under the PBS. I am supportive of the proposed changes but wish to alert the Inquiry that they are insufficient in scope to truly deliver against the recommendations of the Unleashing the Potential of our Health Workforce: Scope of Practice Review, and the delivery of equitable access to medicines for all Australians under the National Medicines policy.

Authorised Professionals Under the National Health Act

The Bill fails to identify Podiatrists – endorsed for scheduled medicines as authorised persons. Podiatrists in Australia have been endorsed to prescribe scheduled medicines in Australia since 2010. Australians accessing care of a podiatrist are currently disadvantaged by the omission of podiatrists from authorised professional status under the act.

Safety Impacts

Podiatrists – endorsed for scheduled medicines do not hold prescribing numbers and are therefore unable to access standard PBS prescribing forms. Podiatrists must develop and print their own prescription forms. Pharmacists receive prescriptions from endorsed podiatrists not on standardised forms. There is risk that a pharmacist, unfamiliar with a particular podiatrist's prescription form, can make errors in reading and dispensing against an unfamiliar form.

Absence of a prescriber number held by podiatrists endorsed for scheduled medicines makes identifying appropriately qualified practitioners challenging. The only mechanism that a pharmacist can use to determine whether a podiatrist is endorsed to prescribe scheduled medicines is to check the National Register. This process is different to other prescribers who are endorsed to access PBS creating risk in identifying who should be issuing a valid prescription for a patient.

Podiatrists are unable to access electronic prescribing. All podiatrist prescriptions are written in paper format as without a prescriber number podiatrists can not access electronic prescribing. This reduces efficiency, security, and the connectedness of the health system. Australians accessing the care of a podiatrist must see the podiatrist face to face to obtain the prescription. This reduces the capacity for people to access telehealth services of a podiatrist. Without a prescriber number the government's policy of electronic prescribing by default cannot be achieved.

Patient Disadvantage

Australians accessing podiatry care and requiring prescription medicines may be disadvantaged in three ways.

1. All podiatrist's prescriptions are written as private prescriptions.
2. To access a PBS prescription a patient must pay additional consultation fees to see their General Practitioner (GP). Australians with concession cards are required to spend additional money to see a GP so that they may access a PBS prescription.
3. Veterans must also see their GP to access RPBS prescriptions which delays treatment.

These examples of disadvantage demonstrate that the bill does not fully address the aims of equitable access to medicines for all Australians.

Medicines Regulation and Safety

Podiatrists endorsed for scheduled medicines are able to prescribe S4D and S8 medicines depending on state-based legislation. Without a prescriber number it remains a challenge for regulators such as the PSR or state-based medicines regulators to have effective oversight of podiatrists who regularly prescribe these controlled substances. Provision of authorised prescriber status will enhance the governance of medicines policy within Australia.

Recommended Solutions

In addition to nurses and nurse practitioners, podiatrists – endorsed for scheduled medicines should be included in The Health Legislation Amendment (Prescribing of Pharmaceutical Benefits) Bill 2025. This small addition will address the safety and equity concerns that exist within the current system, address some of the reforms in the Unleashing the Potential of our Health Workforce: Scope of Practice Review and support the objectives of the National Medicines Policy.

Thank you for considering my submission.

Mr Ian Reid
19 January 2026