

**Submission to the Senate Standing Committee on Finance and
Public Administration Inquiry into the Government's Administration
of the Pharmaceutical Benefits Scheme
July 2011**

About Painaustralia:

Painaustralia is a national not for profit body formed to facilitate the implementation of the National Pain Strategy (NPS) by working with consumers, health care professionals, State and Federal Governments and other stakeholders.

The National Pain Strategy was approved by over 150 healthcare, consumer, employer and funder organisations at the National Pain Summit, which was officially opened by the Federal Minister for Health and Ageing, the Hon Nicola Roxon, at Parliament House Canberra in March 2010.

The Strategy provides a blueprint for improving the quality of life for people with pain and their families and for minimising the burden of pain on individuals and the community. The Recommendations, organised under six major Goals, are aligned with the Government's Health Reform agenda.

Following the International Pain Summit in Montreal in September 2010 and an international meeting at the European Parliament in May this year, the Australian NPS has been adopted as a guide for similar strategies in the USA, Canada, the United Kingdom and other countries in Europe.

The Painaustralia network comprises a wide range of consumer organisations whose members include people living with pain, and bodies of healthcare professionals concerned with improving education, prevention and best practice in the management of pain.

Submission:

Painaustralia welcomes the opportunity to provide this submission to the Senate Inquiry into the Government's administration of the Pharmaceutical Benefits Scheme. We commend The Senate for establishing the inquiry.

Our submission focuses on those Terms of Reference, which relate specifically to our aim to improve the quality of life for people living with pain.

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

Painaustralia members are deeply concerned at the recent decisions by Cabinet to defer PBS listing of medicines that are critical to the welfare of patients with chronic conditions, including people living with severe persistent pain.

This action by Cabinet countermands the well-established process for pharmaceutical assessment by the Pharmaceutical Benefits Advisory Committee (PBAC) that involves a comprehensive evaluation of both clinical effectiveness and cost-effectiveness of the medications. No satisfactory explanation has been provided for this decision beyond short term budgetary considerations.

Painaustralia has specific concerns in relation to an oxycodone/naloxone combination compound, because of its unique benefits to people with severe disabling pain. Like other deferred products, this product has undergone a rigorous process of evaluation by the Pharmaceutical Benefits Advisory Committee (PBAC) and has gained pricing approval from the Pharmaceutical Benefits Pricing Authority.

It is of great concern that the Government has rejected the advice of the PBAC. This raises the question of the basis on which Cabinet would overthrow recommendations made by its own expert committee and also of the future role and authority of the PBAC.

b) Consequence to patients of such deferrals

The effective treatment of many patients requiring opioid medication for pain relief, including those with severe disabling chronic pain conditions or cancer, is often compromised because of side effects. The oxycodone/naloxone compound in question can counter the gastrointestinal side-effects associated with opioids, thus contributing to an increased quality of life for such patients.

Patients taking the oxycodone/naloxone compound (rather than oxycodone alone) can avoid the need to take additional medications to counteract side-effects such as constipation and other unpleasant effects on the gastrointestinal tract. At present there is only one preparation available on the Australian market that affords this benefit.

c) The consultation process prior to a deferral

We are not aware that any consultation with affected patients or other stakeholders took place prior to the Cabinet decision in February 2011 to defer a range of medications, including the oxycodone/naloxone compound.

We are concerned that this lack of consultation and rejection of the recommendations of the PBAC not only ignores the plight of patients affected by the decision but also threatens to undermine confidence in the established and respected evaluation processes of the PBAC.

d) Other related matters

A secondary benefit associated with the oxycodone/naloxone compound that appears to have been overlooked by the Government is its very low potential for abuse. This is particularly so in the context of widespread concerns about misuse of opioid medications by injection and their possible diversion into the illegal drug market.

Summary:

We strongly urge the Senate to recommend that the decision of Cabinet in relation to the deferred medications be rescinded. We request this on the grounds of the serious impact on patients, including many with disabling pain conditions, of the lack of consultation with stakeholders associated with this issue, and of the potential to undermine public confidence in the hitherto respected pharmaceutical assessment and approval system.

The submission is supported by Painaustralia organisations including:

Australian and New Zealand College of Anaesthetists - Faculty of Pain Medicine
Australian Pain Society
Australian Pain Management Association
Chronic Pain Australia
Cancer Voices Australia
Palliative Care Australia
Pain Management Research Institute – University of Sydney, Royal North Shore Hospital
Royal Australian College of GP's – Pain Management Group

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