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Global Healthy Living Foundation Australia and CreakyJoints Australia

Submission for the Revised 2022 National Medicines Policy

These comments are submitted by Global Healthy Living Foundation Australia (GHLF Australia) on behalf of its CreakyJoints Australia patient community.

Re: Australian Government Department of Health Draft National Medicines Policy

https://consultations.health.gov.au/pbs-subsidy-taskforce/national-medicines-policy-revised-consultation/supporting_documents/National%20Medicines%20Policy%202022%20%20REVISED%20Consultation%20Draft.pdf

Section 3. Vision, aim, scope, principles and enablers

The Policy's vision, aim, scope, principles and enablers can be found on pages 2-7.

Question 3.1 – Vision

The Policy's vision is to 'achieve the best health, social and economic outcomes for all Australians through a highly supportive medicines policy environment.'

This vision will be achieved through an effective partnership environment. The vision can be found on page 2.

Using the scale below, please indicate your level of agreement with the Policy's vision.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

You can explain your selection or provide comments in the text box below if you wish.

Question 3.2 – Aim

The aim of the Policy has been updated to simplify the language and provide clarity to reflect stakeholder suggestions. The Policy's aim is to ensure:

- Equitable, timely and affordable access to high-quality and safe medicines and medicines-related services for all Australians.

- Medicines are used optimally with a focus on person-centred care.
- Support for a positive and sustainable environment to drive innovation and research, including translational research, and the development of medicines and medicines-related services.

The updated aim can be found on page 2.

Using the scale below, please indicate your level of agreement with the Policy's aim.

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

You can explain your selection or provide comments in the text box below if you wish.

Question 3.3 – Scope

The scope of the NMP has been broadened to include reference to medical devices used in the delivery of medicines and medicines-related services, and the reference to Aboriginal and Torres Strait Islander traditional medicines has been strengthened.

The revised draft NMP refers to:

‘medicine’ as covering a broad range of products that are used to prevent, treat, monitor or cure a disease or health condition. This encompasses prescription medicines, including biologic and non-biologic medicines, gene therapies, cell and tissue engineered medicines and vaccines, non-prescription products, complementary medicines, and traditional medicines, including Aboriginal and Torres Strait Islander traditional medicines. Devices used to administer and monitor the response to medicines are also included.

The term ‘medicines-related services’ include services and programs that support the quality use of medicines and medicines safety. Examples include medication review services and diagnostic services, including for personalised medicines.

This broad scope ensures the policy can adapt and respond to new and emerging treatment options. It also recognises that the definitions of medicines may vary across Commonwealth, state and territory legislation and regulation. The Policy's principles and Pillars are applicable to all the above products and their clinical use. The Policy's scope can be found on page 2.

Using the scale below, please indicate your level of agreement with the Policy's scope.

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

You can explain your selection or provide comments in the text box below if you wish.

Comments:

We were pleased to see that vaccines and devices used to administer biologics have been added to the expanded scope of the NMP.

Question 3.4 – Principles

The principles have been refined to include greater detail on what the principles mean in action. Notable changes include:

- The principle of equity is now ‘equity and access’.
- Partnership-based and shared responsibility are now one principle.

Using the scale below, please indicate your level of agreement with each of the Policy’s Principles and their descriptions. These can be found on pages 6-7.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Person-centred					
Equity and access					
Partnership-based and shared responsibility					
Accountability and transparency					
Innovation					
Evidence-based					
Sustainability					

You can provide further comments in the text box below if you wish.

Comments:

We were very pleased to see that the “Person-centred” principle was moved to the top of this list and that Figure 1 was added to show the centrality of individuals, carers, families and communities along with the relationships between the NMP partners.

We were also pleased to see the addition of “Sustainability” as a principle of the NMP.

Question 3.5 – Enablers

The NMP influences, and is also influenced by, related policies, programs, and initiatives of the wider health system. The list of enablers were supported by stakeholders and have been updated to reflect feedback, including further clarity under the description of the enabler. The updated enablers can be found on page 7.

Using the scale below, please indicate your level of agreement with the inclusion of each of the Policy’s enablers and their descriptions.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Health literacy					
Leadership and culture					
Health workforce					
Research					
Data and information					
Technology					
Resources					

You can provide further comments in the text box below if you wish.

Section 4. Central Pillars

The Policy includes four Central Pillars. Stakeholder feedback on the initial consultation draft 2022 NMP indicated overall support for these Pillars while also indicating the need for further clarity and detail under the Pillar’s description. The Committee has updated the four Central Pillars based on stakeholder feedback. The updated Central Pillars can be found on pages 8-15.

Question 4.1. Pillar 1 – Timely, equitable and reliable access to medicines and medicines-related services, at a cost that individuals and the community can afford.

Using the scale below, please indicate your level of agreement with Pillar 1, including its intended outcome and description.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

If you should wish to provide additional comments, please use the free text boxes below.

Comments:

We were pleased to note that the description of “timeliness” in the NMP now covers access to medicines and related services in times of health emergencies, natural disasters and supply shortages. We also applauded the inclusion of “access” and “affordability” within this pillar.

Question 4.2. Pillar 2 – Medicines meet the required standards of quality, safety and efficacy.

Using the scale below, please indicate your level of agreement with Pillar 2, including its intended outcome and description.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

If you should wish to provide additional comments, please use the free text boxes below. Please select the relevant sections of the Pillar below should you wish to provide additional comments.

Question 4.3. Pillar 3 – Quality use of medicines and medicines safety

Using the scale below, please indicate your level of agreement with Pillar 3, including its intended outcome and description.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

If you should wish to provide additional comments, please use the free text boxes below. Please select the relevant sections of the Pillar below should you wish to provide additional comments.

Comments:

Sections:

- Promoting the quality use of medicines and medicines safety across the health system
- Person-centred care and shared decision-making improve health outcomes and the quality use of medicines

While we applaud and support the focus on reducing harm from high-risk medicines such as opioids, the current practices negatively affect many people with chronic conditions who have been using such medicines responsibly for years. Therefore, we hope the increased focus on shared-decision making and person-centred care in the NMP will once again allow these people to access the medicines they need without stigma or red-tape.

Question 4.4. Pillar 4 – Responsive, innovative and sustainable medicines industry and research sectors with the capability, capacity and expertise to respond to current and future health needs.

Using the scale below, please indicate your level of agreement with Pillar 4, including its intended outcome and description.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

If you should wish to provide additional comments, please use the free text boxes below. Please select the relevant sections of the Pillar below should you wish to provide additional comments.

Section 5. Partnerships – achieving the NMP’s vision and aim

The Committee identified that a strong partnership approach is key to the implementation of the NMP. Guided by stakeholder feedback, the Committee have updated existing sections and included a new section in the revised draft NMP about the partnership approach.

Partnership is articulated in the revised draft NMP in several ways, including:

- Recognition of the centrality of individuals, carers, families and communities, including the relationships between the NMP partners. This can be found on page 3, Achieving the vision and aim through partnerships.
- Broad responsibilities and functions of partners to progress the intended outcomes of the Central Pillars. The list of partners and their responsibilities and functions can be found on pages 16-21.
- Consistent reference to the need for partners to communicate the alignment of their programs, initiatives or activities with the NMP, including how they have put the principles into action. This responds to stakeholder feedback for greater clarity about the connection between the NMP itself and the implementation mechanisms for translating it into practice. This is especially important under the Governance Framework, Implementation and Evaluation sections which can be found on pages 22-23.

The revised draft NMP also includes consistent references on the need for the Policy’s partners to communicate alignment of their programs, initiatives or activities with the NMP, including how they have put the principles into action.

This section will seek feedback on three areas:

1. Key responsible partners and whether all relevant partner groups have been identified.
2. Updated responsibilities and functions of the identified partners.
3. The governance framework, including implementation and evaluation.

Question 5.1. Figure 1 – Centrality of individuals, carers, families and communities, and the relationships between the NMP partners

Figure 1 demonstrates how the NMP influences the relationships between identified key partners and individuals, carers, families and communities.

Using the free text box below, please indicate if there are any partners missing from Figure 1 on page 3.

Comments

We believe the list of partners is comprehensive.

Question 5.2. Pillar 1 – Timely, equitable and reliable access to medicines and medicines-related services, at a cost that individuals and the community can afford.

Using the scale below, please indicate your level of agreement with the partnership approach, including the key responsible partners. The key responsible partners for Pillar 1 can be found on pages 16-17.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

You can provide further comments in the text box below if you wish.

Question 5.3. Pillar 2 – Medicines meet the required standards of quality, safety and efficacy.

Using the scale below, please indicate your level of agreement with the partnership approach, including the key responsible partners. The key responsible partners for Pillar 2 can be found on pages 17-18.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

You can provide further comments in the text box below if you wish.

Question 5.4. Pillar 3 – Quality use of medicines and medicines safety

Using the scale below, please indicate your level of agreement with the partnership approach, including the key responsible partners. The key responsible partners for Pillar 3 can be found on pages 18-19.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

You can provide further comments in the text box below if you wish.

Question 5.5. Pillar 4 – Responsive, innovative and sustainable medicines industry and research sectors with the capability, capacity and expertise to respond to current and future health needs

Using the scale below, please indicate your level of agreement with the partnership approach, including the key responsible partners. The key responsible partners for Pillar 4 can be found on pages 20-21.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

You can provide further comments in the text box below if you wish.

Question 5.6. Governance Framework

The revised draft NMP maintains a description of a governance approach that embraces partnership. It has been updated to be described as a framework to better reflect a governance approach that is focused on co-ordination and shared problem solving and accountability, rather than being prescriptive about specific structures. It also recognises that each partner is responsible and accountable for achieving the NMP's aim and intended outcomes. The Policy's governance framework can be found on page 22.

Using the scale below, please indicate your level of agreement with the Policy's governance.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

You can provide comments in the text box below if you wish.

Question 5.7. Implementation

The revised draft NMP remains consistent with the idea that the NMP functions as a co-ordinating framework that sets out the Pillars and intended outcomes for all partners to work towards. As no single partner is solely responsible for achieving the Policy's aim, its implementation is a collective responsibility that should be documented appropriately at the program level by each partner. This could include better alignment between policy, legislation and regulatory frameworks across different levels of government.

The Policy's implementation is outlined on page 22.

Using the scale below, please indicate your level of agreement with the Policy's implementation.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree

- Strongly disagree

You can provide comments in the text box below if you wish.

Question 5.8. Evaluation

The revised draft NMP describes beneath each Pillar the intended outcomes that the partners should collectively strive to achieve. The Committee updated the evaluation section to reiterate the importance of a partnership approach to evaluation and the need to better align policies, strategies, programs, and initiatives that underpin the NMP. The Policy's evaluation, including guidance for components of an evaluation strategy aligned to the NMP, is outlined on page 22.

Using the scale below, please indicate your level of agreement with the Policy's evaluation.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

You can explain your selection or provide comments in the text box below if you wish.

Section 6. General Comments

Please provide any additional comments you may have on the revised consultation draft 2022 NMP.

Comments:

GHLF Australia and CreakyJoints Australia were pleased that the original draft of the 2022 NMP was paused before the Federal Election as the additional time has allowed the committee to develop a much more detailed, functional and inclusive policy. We believe this revised draft is ready to be finalised and presented to the Federal Government.