

HTA Improvement Section
Technology Assessment and Access Division
Department of Health
GPO Box 9848,
Canberra ACT 2601, Australia

29 April 2019

Dear Sir/Madam

CONSULTATION: MEDICINE STATUS WEBSITE

Painaustralia welcomes the opportunity to provide input to the Department of Health consultation around Pharmaceutical Benefits Schedule (PBS) process improvements and the publication of information on the Medicine Status Website (MSW).

Painaustralia is the national peak body working to improve the quality of life of people living with pain, their families and carers, and to minimise the social and economic burden of pain. Members include pain and other specialists, health practitioners, health groups, consumers and researchers. Painaustralia works with our network to inform practical and strategic solutions to address this complex and widespread issue. As such, the issue of transparency and listing of new prescription medicines is important to our members and stakeholders.

Painaustralia notes that the availability of information is a cornerstone of informed decision making. From a patient perspective, earlier knowledge about potential availability of treatments, should they be approved, may be considered as part of discussion about options for medical treatment and care with their healthcare practitioners. It is equally important to ensure that consumers also have all the facts before they can make such informed decisions which will impact their treatment pathways.

Overall, Painaustralia supports the PBS process improvements project and endorses the proposed MSW website that aims to improve transparency on the progress of submissions through the PBS listing system.

Ensuring informed decision-making

There are few decisions in pharmacological management where there is only one unequivocally correct answer for everyone. This is especially true for the management of chronic pain, where at most clinical decision points, there are several possibilities that could be taken into account to address the issue or concern, including different treatments (e.g. different medications), non-pharmacological approaches, preventive strategies or lifestyle changes, in addition to the 'no active treatment' option, advice and reassurance.

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When considering the changes that will flow from the availability of information on the MSW, it is important to recognise that there may be unintended consequences from the availability of this information, especially for a vulnerable consumer cohort.

Case Study: Prescribing of Medicinal Cannabis for Non-Cancer Pain

The majority of people who seek medicinal cannabis do so for pain management, and there is growing interest and expectation around the use of these products to treat a range of conditions.ⁱ

This may be due to increased information and awareness around the availability of medicinal cannabis, the recent establishment of a regulatory framework for these products, and interest in seeking out alternatives to opioids and other pain medications.

There is now widespread use of cannabis products and a high degree of community support for greater access to them for a range of reasons. This situation highlights the significant gaps in access to, and understanding of, best practice pain management amid a rising pain burden.

Despite the legalisation and decriminalisation of cannabis in some places here and overseas, there have only been a limited number of well-designed clinical studies on medicinal cannabisⁱⁱ and its role in treating chronic pain. There is little evidence about suitable doses of individual cannabis products, such as randomised controlled trials or systematic reviews, that enable definitive statements on effectiveness of medicinal cannabis. This lack of evidence makes it difficult for practitioners to prescribe, despite community expectations that these products will be made available to treat chronic non-cancer pain.

Overall in the case of cannabis medications, access to information around the availability of a potential new therapeutic good has raised consumer expectations. In reality, access remains highly regulated, is expensive, and is often not appropriate.

While Painaustralia supports current efforts to enable expedient access to medicinal cannabis where it has been correctly prescribed, we remain concerned about the unintended consequences of inappropriate cannabis prescribing on a uniquely vulnerable cohort of consumers.

The case study above highlights that often consumers only have access to limited information when considering their healthcare options, which offers them an incomplete picture, especially in regards to new and emerging therapeutic goods. It is crucial that consumers are supported and given well-designed, reliable, balanced, up-to-date information to help them make their decision and advocate for their healthcare.

Streamlining process across systems

As the Department maybe aware, the Therapeutic Goods Administration (TGA) also recently consulted around whether they should be made public when prescription medicine is under evaluation. Efforts should be made to ensure that transparency and access to information can be seamlessly integrated across the system, from the point of a medicine gaining approval for market by the TGA, to the point that it is eventually listed on the PBS. This will be vital to ensuring that consumers have access to all the relevant information that can aid their decision-making process.

Informed decision making support for consumers

While Painaustralia is supportive of the implementation of the MSW, it is vital that this information be contextualised for consumers, to ensure that they understand the complexities of the evaluation process and do not misinterpret the information.

It is important to highlight that not all medicines that begin a listing process on the PBS progress to the listing stage or get listed on the Pharmaceutical Benefits Scheme. Consumer resources should be developed to support the implementation of MSW and enable informed decision-making.

We trust that the matters raised in our submission will be useful in helping the Department in progressing PBS process improvements and welcome the opportunity to discuss our submission with you further.

Yours sincerely

Carol Bennett
Chief Executive Officer

ⁱTherapeutic Goods Administration 2017. Guidance for the use of medicinal cannabis in Australia Overview. Access online [here](#).

ⁱⁱ Op. Cit TGA 2017.