



25 November 2019

**NACCHO response to PBS request for submissions on the Terms of Reference for the Post-market review of medications for smoking cessation**

NACCHO welcomes this review and generally agrees with the Terms of Reference (TOR), but have a few proposed minor amendments outlined below.

We have consulted with representatives of member ACCHOs through the joint NACCHO and Pharmaceutical Society of Australia (PSA) Pharmacist Leadership Group at our most recent meeting on the 5<sup>th</sup> of November and the group support our submission.

We would particularly like to draw attention to the proposed TOR number 2.

2. "Review the utilisation of PBS-listed medicines for smoking cessation including patient demographics, time on treatment, and the proportion using PBS subsidised combination treatment"

We propose this Term should particularly consider Aboriginal and Torres Strait Islander peoples in the demographics review, as a group disproportionately represented in smoking rates and affected by smoking related illnesses at a significantly higher rate than other Australians<sup>1</sup>

When looking at the utilisation (TOR 2.) and cost-effectiveness (TOR 4.) of PBS-listed medicines for smoking cessation, we would like the review to consider medications for smoking cessation are sometimes supplied to our patients through alternate PBS streams such as the S100 RAAHS measure.

Our sector is endeavouring to reduce smoking rates and has been proactively seeking subsidy of evidence-based non-PBS medications for smoking cessation, for example to allow the use of combination long and short acting nicotine replacement products. This activity has included purchases from ACCHO's core funding to supply NRT at no cost to patients and accessing compassionate supplies from pharmaceutical companies.

We welcome this review and hope that it can improve health equity through enhanced access to evidence-based treatment to assist Aboriginal and Torres Strait Islander people quit smoking. We hope the review considers the potential long-term savings to the health system in general when people can avoid smoking relating illnesses.

Dr Dawn Casey PSM FAHA  
NACCHO Deputy Chief Executive Officer

<sup>1</sup> <https://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/4737.0~1994%20to%202014-15~Main%20Features~Smoking%20Prevalence~10> accessed 20/11/2019