

Post-market review section
Technology Assessment and Access Division | Health Benefits Group
Office of Health and Technology Assessment Policy and Programs Branch
Australian Government Department of Health

By email: PBSsubmissionsPMR@health.gov.au

To whom it may concern

Re: Public consultation on the post-market review of medicines for smoking cessation

I am writing to thank the Australian Government Department of Health for the opportunity to provide feedback on the Final Terms of Reference (fTOR) for the Post-Market Review of Medicines for Smoking Cessation. The Australian College of Nursing (ACN) has carefully reviewed the fTOR and believes they are appropriate and well-considered. ACN represents registered nurses, enrolled nurses, and advanced practice nurses who work across a variety of health care settings including primary care settings. Our nurses often engage with individuals in these settings who are seeking non-pharmacological and/or pharmacological therapies for smoking cessation.

In the primary care setting nurses are one of several front-line health care professionals (including pharmacists and GPs) who are well positioned to support people wishing to quit smoking. ACN believes nurses have a significant role in the “process” of smoking cessation which would extend to the area of Post-Market Review (PMR). Nurses often provide advice, consultations, appointments and follow up to those who indicate a willingness for smoking cessation. ACN believes keeping the lines of communication open and consistent engagement provides the necessary support for motivated smokers to quit. Furthermore, it affords nurses the opportunity to identify which pharmacological therapies (including PBS and non-PBS listed items) are working effectively for their patients, and which are well tolerated with minimal side effects. ACN has stated that the frequency of such consultations should be patient specific and discussed in an agreeable health coaching approach¹.

ACN members believe that the “process” for smoking cessation support provided by nurses is conducive to achieving the aims of PMR – namely ensuring “continued safe, cost-effective and quality use of medicines listed on the PBS”. ACN has previously supported the establishment of a nation-wide system for identifying smokers and documenting their tobacco use in every practice or healthcare service². By having the data digitally recorded as part of patients’ electronic medical record, this could guide health care practitioners (including nurses) on side effects, contraindications and drug interactions which are particularly important in the prescribing of medications for smoking cessation and for PMR.

¹ <https://www.acn.edu.au/wp-content/uploads/20190612-smoking-cessation-ACN-response.pdf>

² *ibid.*



ACN's members feedback with regards to the Final Terms of Reference are as follows:

- It is noted that e-cigarette devices and nicotine liquids are not currently included in the Post Market Review (PMR). ACN is supportive of the exclusion of e-cigarettes in the fTOR. However, the fact that e-cigarettes have not been approved for smoking cessation needs to be stressed and mentioned in the guideline.
- With regards to fTOR (3), ACN is supportive of reviewing combination therapies which are not currently listed on the PBS. Combination therapies are not currently PBS listed as there is no evidence of cost-effectiveness despite evidence of clinical improvement. ACN believes combination therapies that work for individuals should be subsidised by the government to ensure that those expressing an interest in quitting smoking remain compliant to the process of smoking cessation. The cost to the patient has the potential to negatively impact compliance.

The Australian College of Nursing is the national leader of the nursing profession and a strong collective voice for nurses in all health care settings. Together, we increase the quality of patient care for all Australians. Our mission is advancing nurse leadership to enhance health care.

If you have any questions please do not hesitate to get in touch with me, Dr Carolyn Stapleton FACN, Director– Policy and Advocacy.

Yours sincerely

A handwritten signature in cursive script that reads "Carolyn M Stapleton".

Dr Carolyn Stapleton FACN
Director – Policy and Advocacy
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