



19 July 2021

PHARMAC

email: pharmacreview@health.govt.nz

Re: PHARMAC review

About the NZSA

The NZSA is a professional medical education society, which represents over 650 medical anaesthetists in New Zealand. Our members include specialist anaesthetists in public and private practice, and trainee anaesthetists. We facilitate and promote education and research into anaesthesia and advocate for the specialty and the safety of patients. As an advocacy organisation, we develop submissions on government policy and legislation, work collaboratively with key stakeholders, and foster networks of anaesthetists nationwide. The NZSA, established in 1948, also has strong global connections, and is a Member Society of the World Federation of Societies of Anaesthesiologists (WFSA).

Comments

Thank you for the opportunity to respond to the review. We have responded to some of the questions in the form provided. Additionally, we have further commented on some issues below, which we recommend PHARMAC consider in its review.

We believe that it is appropriate for PHARMAC to review its structure, especially in terms of how it can be nimble to deliver timely turnaround of applications, some of which appear to be inordinately delayed.

Greater clarity and transparency are needed across PHARMAC's work, such as the decision-making process, the composition of advisory groups and the process on seeking feedback. Often PHARMAC will send out emails with long lists of items which are difficult to comprehend, and even when clarification has been sought on how to respond, PHARMAC has not sent clear guidance on how to provide feedback.

Greater clarity and transparency are also required to help clinicians and the public understand how PHARMAC considers evidence when making decisions about funding of medicines e.g. Herceptin was used internationally for many years before it was approved in New Zealand, and this approval was only granted after legal action was taken by patients and clinicians, which was followed by Government intervention to enable funding of this drug. There are many examples of drugs being declined for funding in New Zealand, which have often been approved in overseas jurisdictions, including countries we often compare ourselves to such as Australia and the US. While we acknowledge that there are funding limitations, it is often not easy to understand the justification behind PHARMAC's decisions. Ultimately, some of New Zealand's health outcomes for a range of conditions have fallen behind other comparable countries such as Australia.



We strongly support the review of PHARMAC and look forward to hearing the outcomes of this consultation to help ensure PHARMAC operates more effectively for the benefit of our patients and health system.

The NZSA is happy to discuss our comments and to answer any questions in relation to this consultation. I can be contacted at president@anaesthesia.nz

Yours sincerely

A handwritten signature in black ink, appearing to read "Sheila", is written over a light grey rectangular background.

Sheila Hart
President