

Intergovernmental Committee on Drugs
C/O Detective Superintendent Brett Guerin
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Dear Detective Superintendent Brett Guerin and IGCD Members,

The Alcohol and other Drugs Council of Australia (ADCA) is pleased to learn that Methadone, Buprenorphine and their associated pharmacy dispensing fees were included in discussions at the recent Intergovernmental Committee on Drugs (IGCD) meeting on Thursday 29 March 2012. ADCA welcomes this inclusion and supports the concerns raised by Dr Adrian Reynolds Clinical Director from the Alcohol & Drug Services, Tasmania. We would like to reinforce the importance of this issue since accessible and equitable treatment is critical to the success of Opioid Substitution Therapy (OST).

ADCA is the national peak body representing the interests of the Australian non-government sector for alcohol and other drugs. It works collaboratively with the government, non-government, business and community sectors to promote evidence-based, socially just approaches aimed at preventing or reducing the health, economic and social harm caused by alcohol and other drugs to individuals, families, communities and the nation. ADCA draws upon the collective wisdom and expertise of the sector on alcohol and other drugs (AOD) issues affecting Australia. This letter is written with support of Dr Suzanne Nielsen, Chair of the ADCA Pharmaceuticals Working Group. ADCA's policy on Pharmaceuticals refers to this issue and is attached for your information.

Both Methadone and Buprenorphine are listed on the Pharmaceutical Benefits Scheme (PBS) under Section 100 as restricted drugs, and are provided free by the Commonwealth. They are distributed by accredited Clinics and Pharmacies who charge a dispensing fee to cover service and accreditation expenses associated with supplying these drugs. This rate varies significantly within and across State and Territories with the average fee estimated at \$150 per month. The cost is compounded by associated travel expenses for those who have to travel elsewhere to access a participating pharmacy. Only 40% of Pharmacies supply OST medications so travel costs can be significant, particularly for those requiring daily dosing and for those who live in rural and remote areas.

The underlying principle of supplying OST in Australia is to encourage people suffering from opioid dependence to access and stay in treatment. One way to do this is to remove the disincentives of treatment. The Pharmacy dispensing fee and associated travel costs present a real disincentive to a population group who by and large are mostly low income earners and unemployed.

ADCA encourages the IGCD to urge Ministers to consider including Methadone and Buprenorphine in Section 85 of the PBS. As with all medications under Section 85, participants would be charged co-payments for their treatment, and would be protected by the maximum expenditure safety net.

Treating Methadone and Buprenorphine in the same way as other treatments for chronic disease is important to reduce the financial burden to clients, increase the likelihood of treatment uptake, reduce program drop-out, and ensure equitable treatment of these drugs. Furthermore, it would simplify adjustment procedures that are dealt with automatically through the PBS, encourage greater pharmacy participation, improve accessibility to participants and reduce stigma. This approach has least impact on the person receiving treatment and therefore makes it easier for them to maintain treatment.

ADCA acknowledges that further work is required to establish appropriate mechanisms to reimburse pharmacists to cover service and accreditation expenses associated with these treatments. While OST has been specifically excluded from the staged supply initiative in the 5th Community Pharmacy Agreement (where pharmacists may receive an incentive payment under the Pharmacy Practice Incentive Program for providing staged supply services of medications at regular intervals), such options provide a model to appropriately remunerate Pharmacists for daily supervised dosing services. ADCA supports further research into funding arrangements that are fair and sustainable for both dispenser and consumer.

ADCA would be pleased to discuss this issue in more detail. In the first instance, please contact Lucy Barnard at lucy.barnard@adca.org.au or on 02 6215 9814.



David Templeman
Chief Executive Officer
Alcohol and Other Drugs Council of Australia