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Australia

30 June 2022

PBS Process Improvements Section  
Technology Assessment and Access Division  
Department of Health  
GPO Box 9848,  
Canberra ACT 2601

To whom it may concern,

**Public Consultation: Draft 2022-23 Cost Recovery Implementation Statement (CRIS) for listing medicines on the PBS and designated vaccines on the NIP**

Thank you for providing Pfizer Australia with the opportunity to make a submission to the above consultation.

Pfizer Australia is one of the nation's leading providers of prescription medicines and vaccines. We manufacture medicines and vaccines that millions of Australians use every day to live longer, healthier, and more productive lives. Every day our people work with the sole purpose of ensuring that Australians can access new and innovative medicines that are being used to treat some of the most feared conditions of our time. We are proud of the active role we play in Australia's health system and the wider contribution we make as an innovator, employer, and manufacturer.

Pfizer Australia acknowledges the basis for cost recovery as it relates to PBAC/PBS/NIP related activity. Pfizer Australia welcomes improved processes that benefit Australians accessing medicines and vaccines via the PBS and NIP and the manufacturers that work within these systems to make those medicines and vaccines available. In particular, Pfizer Australia welcomes improved processes that can reduce the time and complexity and the associated cost taken to achieve equitable access to medicines and vaccines for Australians.

We are a proud member of Medicines Australia, the peak body representing innovative pharmaceutical companies in Australia, and encourage the careful consideration of the requests for clarification and change in their submission to this consultation. In particular, we draw your attention to the following:

- We are concerned that a fee is proposed for ATAGI submissions that pre-supposes a change in process that has not been subject to appropriate consultation. We submit that fees should not be proposed or implemented in advance of consultation and alignment on process changes, in line with usual practice.
- We are concerned that the proposed reduction in the fee for applications for Ministerial Discretion, which is welcomed, is due to occur on 1 August 2022 when the deadline for applications related to Statutory Price Reductions scheduled for 1 April 2023 is Friday, 29 July 2022. Very clearly, the effort to which the fee applies will occur starting from Monday, 1 August and the fee would be more accurately and appropriately aligned with this reality. We note that ordinarily, the 2022-2023 fees would take effect from 1 July 2022. In the interests of fairness and accuracy, we request that the 2022-23 fee for Ministerial Discretion Requests takes effect in a manner that is aligned with the application deadline. This can be achieved by a minor change in the deadline for these applications for Ministerial Discretion, from Friday, 29 July to Monday, 1 August 2022.

Thank you again for the opportunity to contribute to this consultation. Pfizer Australia is available at any time to provide further input.

Yours sincerely,



**Anne Harris**  
Managing Director



**Louise Graham**  
Head of Market Access ANZ

