Improve the mental health of communities
About the Royal Australian and New Zealand College of Psychiatrists

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) is a membership organisation that prepares doctors to be medical specialists in the field of psychiatry, supports and enhances clinical practice, advocates for people affected by mental illness and advises governments on mental health care. The RANZCP is the peak body representing psychiatrists in Australia and New Zealand and as a bi-national college has strong ties with associations in the Asia-Pacific region.

The RANZCP has more than 7,700 members including more than 5,500 qualified psychiatrists and almost 2,100 members, who are training to qualify as psychiatrists. Psychiatrists are clinical leaders in the provision of mental health care in the community and use a range of evidence-based treatments to support a person in their journey of recovery.

Consultation Introduction

The RANZCP welcomes the opportunity to provide further feedback on the revised draft of the National Medicines Policy (NMP). The below submission details RANZCP’s response to key changes to the previous draft NMP.

Further information on the RANZCP’s position on the NMP review can be found in previous submissions during the NMP consultation process:

- RANZCP response to the NMP review discussion paper (October 2021)
- RANZCP response to the NMP first draft (February 2022)

Questions

Section 4: Central Pillars

To what extent do you agree with the following of the revised draft NMP?

Pillar 1 - ‘Timely, equitable and reliable access to medicines and medicines-related services, at a cost that individuals and the community can afford.’

☑ Strongly agree
☐ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree

Further Feedback:

As identified in our previous submission, the RANZCP welcomes the inclusion of ‘equitable’ to this pillar, noting that there are affordability and equity issues for medications which require diagnoses to be made at a particular age. This, for example, is the case for some ADHD medications.
Pillar 2 - 'Medicines meet the required standards of quality, safety and efficacy.'

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Further Feedback:
The RANZCP reiterates that input from specialist medical colleges should be formally integrated in the system of approving, listing and reviewing medications. Members of specialist medical colleges practice in both clinical and research settings, and this expertise is valuable. It is important that, following the introduction of an approved medication, indications and doses be regularly reviewed and updated to reflect the best evidence.

Pillar 3 - 'Quality use of medicines and medicines safety'

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Further Feedback:
The RANZCP reiterates its recommendation from our previous submission, which recommends the following addition: ‘to coordinate and fund appropriate, medically-informed programs and processes…’.

The RANZCP welcomes the inclusion of guidance (p.5) on prescribing or deprescribing a medicine, including consideration of “clinical and non-clinical factors, patient experiences and preferences, potential benefits and harms, and the out-of-pocket cost of access”. This reflects prior RANZCP feedback to better define appropriate prescribing.

Pillar 4 - 'Responsive, innovative and sustainable medicines industry and research sectors with the capability, capacity and expertise to respond to current and future health needs.'

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
Further Feedback:
As the RANZCP noted in its previous submission, concepts of timeliness and responsivity are important and rightly present throughout this draft policy. It's continued inclusion on the revised draft is welcomed.

Evaluation - To what extent do you agree with new intended outcomes for each pillar and further revisions to the evaluation section to better emphasise the importance of a partnership approach to evaluation?

☑ Strongly agree
☐ Agree
☐ Neither agree nor disagree
☐ Disagree
☐ Strongly disagree

Further Feedback:
Following previous feedback that emphasised the need for whole-of-system evaluation in care provision, the RANZCP welcomes revisions to the NMP that consider evaluation of the various parts of the health system. There are several topics that cross the whole system such as psychotropic medications in the aged care and disability sectors, and the greater focus on partnership with these is a welcome development.