

Medicines Australia's Submission to the CDC (Centre for Disease Control) Consultation

9 December 2022

Medicines Australia welcomes the opportunity to contribute to the Australian Centre for Disease Control (CDC) Consultation.

Medicines Australia is the peak body representing the innovative, research-based, medicines industry in Australia. Our members discover, develop and manufacture medicines and vaccines that help people live longer, healthier lives and bring social and economic benefits to Australia.

Establishing the CDC to improve Australia's ongoing response and preparedness for current and emerging public health emergencies, is an initiative supported by Medicines Australia and its members.

Below are the primary considerations Medicines Australia and its members have for developing an Australian CDC.

1. Phased implementation starting with communicable diseases

Medicines Australia and its members support the proposed phased implementation of the CDC. Medicines Australia acknowledges that advancing public health in Australia has been held back by a lack of focus on preventative health and failure to engage with those primary causative factors affecting chronic disease.¹ However, whilst the inclusion of preventative health is key to supporting all the goals of the CDC, the first priority of the CDC should be communicable diseases, building out the role of the CDC in pandemic preparedness.

The depth and breadth of what the CDC aims to achieve is ambitious. Attempting to implement all the elements at establishment could put too much strain on already stretched departments, such as the Department of Health and Aged Care (DOHAC), that are required to support the establishment of the CDC.

2. An independent CDC with a clear remit

The CDC should be independent, have a clear remit for its authorities and responsibilities, with the powers of the entity enabled by legislation. It should include a coordinated national approach that enables not just cross-agency collaboration at a federal level, but also close collaboration with state and territory governments to avoid a fragmented approach to future threats.

However, it is important that the CDC does not simply become another department within the Federal Government, replicating work performed by other departments or agencies like the Australian Institute for Health and Welfare (AIHW).

¹ <https://www.mdpi.com/1660-4601/13/4/400>

To be successful, the CDC should have its own budget and be free from political interference. It could be based on entities such as the Commonwealth Scientific and Industrial Research Organisation (CSIRO), that have their own dedicated funding² and independent Boards.

3. Nationalising Data

DOHAC utilised the Multi-Agency Data Integration Project (MADIP)³ to combine information on health, education, government payments, income and taxation, employment, and population demographics to inform strategies to increase vaccination rates across different population groups.⁴ Connecting various data sources during the pandemic was crucial to the success of the COVID-19 vaccine roll out in Australia.

The CDC should utilise and take a lead role in moving the data infrastructure needs forward and prevent the most vulnerable populations from being left out due to the limitations of current data infrastructures. A strong, nationalised, and secure data infrastructure will monitor disease distribution in Australia more efficiently and better inform policy interventions for health issues at a population level.

4. National oversight of the supply of medicines

The CDC should have national coordination and oversight of the supply of essential vaccines and medications during health emergencies, including disease outbreaks, natural disasters, and mass casualty incidents. Centralised coordination and oversight will prevent situations where multiple agencies have competing priorities in managing a crisis, and to ensure equitable distribution of supply.

Furthermore, the CDC should regularly consult with industry, including peak bodies such as Medicines Australia, and with state and territory governments during the establishment, as well as operation of the CDC. Regular consultations will help develop improved mechanisms for emergency procurement of medicines to boost national stockpiles and limit stockpiling from large scale procurers.

5. Maintaining engagement with industry and other stakeholders

Medicines Australia acknowledges the need for inter-jurisdictional, multi-stakeholder support and engagement to achieve the goals of the CDC. This includes maintaining engagement with the pharmaceutical industry, who should play a critical role in working with Government and decision-makers in crisis mitigation and response planning.

Multi-stakeholder engagement should support a 'One Health' approach that reflects connections between the health of humans, animals, and the environment. This is essential given the risk of zoonotic disease transfer between animals and humans, as occurred during the COVID-19 pandemic.

The complexity of Australia's pharmaceutical supply chain highlights the importance of the CDC's engagement with the pharmaceutical industry. The industry therefore needs to be consulted should the CDC's activities have any impact on approval or purchasing arrangements for medicines and

² <https://www.csiro.au/en/news/news-releases/2022/2022-23-federal-budget>

³ <https://www.abs.gov.au/about/data-services/data-integration/integrated-data/multi-agency-data-integration-project-madip>

⁴ <https://www.abs.gov.au/about/data-services/data-integration/integrated-data/multi-agency-data-integration-project-madip/multi-agency-data-integration-project-madip-research-projects#commonwealth-government>

vaccines, including via the Australian Technical Advisory Group on Immunisation (ATAGI), the Pharmaceutical Benefits Advisory Committee (PBAC), or the Medical Services Advisory Committee (MSAC). The CDC should ensure that the population is able to access medicines and vaccine promptly and does not become another gatekeeper to access.

Additionally, access to medicines, especially innovative medicines, will be critical to tackling the emerging health issues and emergencies of the future. It is therefore imperative that the CDC becomes a trusted partner in a globally interconnected research-driven pharmaceutical industry.

Medicines Australia and its members look forward to the development of an Australian CDC and building a continuing partnership with the new entity to strengthen Australia's resilience and preparedness for the health issues of tomorrow.

Contact:

Constantine Tablan
Policy Analyst
Medicines Australia
constantine.tablan@medicinesaustralia.com.au
17 Denison Street, Deakin ACT 2600