

15 December 2022

Senate Standing Committees on Community Affairs  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Committee Members,

**Re: Senate Inquiry into Universal Access to Reproductive Healthcare**

Medicines Australia welcomes the opportunity to provide comment on the Senate Inquiry into *Universal Access to Reproductive Healthcare*.

We are pleased the Committee has recognised the barriers to implementation of the *National Women's Health Strategy 2020–2030*, including access to sexual and reproductive health information, treatment and services that offer women greater choice and control in matters affecting their bodies.

Medicines Australia would like to share specific responses to the Term of Reference a.i. (cost and accessibility of contraceptives - PBS coverage and TGA approval processes for contraceptives). Access to contraceptives as well as other women's health medicines has a positive impact on reproductive health, human rights and the economic status of women, which are fundamental for greater equality, education and prosperity for all<sup>12</sup>. Therefore, giving all Australians timely access to reliable contraception at an affordable price is likely to have a significant, positive impact on Australian society as a whole, and Medicines Australia is supportive of measures designed to achieve this goal.

In the current environment of health technology assessments that evaluate the incremental clinical benefits of new contraceptive technologies, cost-effectiveness evaluations are undertaken on the basis of the number of unintended pregnancies. However, they do not consider the incremental clinical benefits for outcomes including reductions in excessive bleeding, anaemia, dysmenorrhoea or sexual health, which all affect patient experience, satisfaction, physical health, mood and general wellbeing and thus women's quality of life<sup>3 4 5</sup>. Furthermore, the societal impacts of unplanned pregnancies are high. It is estimated that 80,000 terminations occur each year in Australia<sup>6</sup>. An estimated 40–50% of Australian women have had an unintended pregnancy during their reproductive lives<sup>7 8</sup>. Evidence suggests unintended childbearing is associated with a significantly increased risk of maternal depression, anxiety and a decline in psychological wellbeing or psychosocial conditions<sup>9</sup>. However, the cost of these societal impacts are also not considered in the current health technology assessment of new therapies.

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<sup>1</sup> Institute for Women's Policy Research, "ECONOMIC EFFECTS of CONTRACEPTIVE ACCESS: A Review of the Evidence CENTER on the ECONOMICS of REPRODUCTIVE HEALTH" (Washington DC: Institute for Women's Policy Research, 2019), [https://iwpr.org/wp-content/uploads/2020/07/B381\\_Contraception-Access\\_Final.pdf](https://iwpr.org/wp-content/uploads/2020/07/B381_Contraception-Access_Final.pdf).

<sup>2</sup> World Health Organization, "Monitoring Human Rights in Contraceptive Services and Programmes" (Geneva, 2017), <https://www.who.int/publications/i/item/9789241513036>.

<sup>3</sup> <https://www.pbs.gov.au/industry/listing/elements/pbac-meetings/psd/2019-03/files/levonorgestrel-psd-march-2019.pdf>

<sup>4</sup> Williams SL, Parisi SM, Hess R, Schwarz EB. Associations between recent contraceptive use and quality of life among women. *Contraception*. 2012 Mar;85(3):282-7. doi: 10.1016/j.contraception.2011.08.004. Epub 2011 Sep 19. PMID: 22067760; PMCID: PMC3273651.

<sup>5</sup> Beckert V, Aqua K, Bechtel C, Cornago S, Kallner HK, Schulze A, Parashar P, Waddington A, Donders G. Insertion experience of women and health care professionals in the Kyleena® Satisfaction Study. *Eur J Contracept Reprod Health Care*. 2020 Jun;25(3):182-189. doi: 10.1080/13625187.2020.1736547. Epub 2020 Mar 30. PMID: 32223466.

<sup>6</sup> Grayson N, et al. Use of Routinely Collected National Data Sets for Reporting on Induced Abortion in Australia. Sydney: Australian Institution of Health and Welfare National Perinatal Statistics Unit; 2005.

<sup>7</sup> Marie Stopes International Australia. Real choices: women, contraception and unplanned pregnancy. Sydney: MSIA; 2008

<sup>8</sup> Rowe H, et al. Prevalence and distribution of unintended pregnancy: the Understanding Fertility Management in Australia National Survey. *Aust NZ J Public Health* 2016;40:104-9

<sup>9</sup> Gipson J, et al. The effects of unintended pregnancy on infant, child and parental health: a review of the literature. *Studies in Family Planning* 2008;39(1):18-38

In assessing new contraceptives, these other factors should be considered as part of the evaluation process.

To effectively inform policy and practice changes, robust data on current prescribing and use of contraceptives in Australia is required. The reporting of these data on an annual basis should be mandated. This national resource should inform the Australian government's approach towards sexual and reproductive health policy and measure the success of any policy interventions to ensure successful implementation of the *National Women's Health Strategy 2020–2030*.

To discuss these issues further, please contact Emily Skillin (Policy Analyst, [Emily.skillin@medicinesaustralia.com.au](mailto:Emily.skillin@medicinesaustralia.com.au)).

Kind regards,



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