

GSK Australia Submission: The Australian Cancer Plan 2022-2033

Introduction

GSK Australia welcomes the invitation to have input into The Australian Cancer Plan 2022-2033 (Cancer Plan). We support the Cancer Plan's aim to achieve world-class cancer outcomes for all Australians. GSK is a science-led global healthcare company. We aim to develop and deliver medicines to help people with cancer to not only live, but to live well.

An estimated 413 Australians are diagnosed with cancer per day. It is well recognised that cancer places a substantial social and economic burden on families and the community¹.

There have been significant advances in cancer diagnosis, treatment and care over the past 30 years. However, not all access is equal, and cancer remains one of this country's biggest killers.

Regional and rural Australians are among those impacted by current inequities. Regional and rural Australians are at greater risk of cancer, and limited access to health services means they are more likely to experience poorer health outcomes² as a result. Further, recognised disadvantage sees Aboriginal and Torres Strait Islander peoples disproportionately affected, and overrepresented in cancer incidence and mortality statistics³.

Together, we can do better.

The Cancer Plan provides an opportunity for patients, carers, health professionals, researchers, charities, industry and government to come together to set an ambitious vision the future and unite behind a road-map of focused, evidence-based actions to get us there.

This includes drawing on lessons in cancer prevention, diagnosis, treatments, and support nationally and across the globe to develop tailored solutions to improve health outcomes for all Australians. It also means supporting and fostering innovation now and into the future.

The Australian Cancer Plan has the potential to save lives and improve health outcomes benefiting the community, health system and the economy.

GSK recommends the Australian Cancer Plan include:

- An agreed ambitious, meaningful and actionable vision.
- Commitment to patients being at the centre of the Cancer Plan, recognising the impact of cancer extends beyond the individual diagnosed.
- Recognition that the funding of medicines and proven interventions is an investment in better health outcomes.
- Recognition of the vital role of innovation, global collaboration and the Cancer Plan acting as an enabler.
- Optimisation of data collection, integration and transparency.
- Commitment to partner with stakeholders in the development and delivery of the plan, including defined frameworks for governance, implementation and performance measures.

¹Australian Institute of Health and Welfare 2021, 'Cancer Data In Australia',

<https://www.aihw.gov.au/reports/cancer/cancer-data-in-australia/contents/summary>

²Australian Government Department of Health 2019, 'Australia's Long Term National Health Plan to build the world's best health system',

https://www.health.gov.au/sites/default/files/australia-s-long-term-national-health-plan_0.pdf.

³Cancer Council 2022, 'Cancer Statistics',

[https://www.cancersa.org.au/research/cancer-](https://www.cancersa.org.au/research/cancer-statistics/#:~:text=Aboriginal%20Australians%20are%201.5%20times%20more%20likely%20to,terms%20of%20incidence%20and%20mortality%20in%20Aboriginal%20Australians.)

[statistics/#:~:text=Aboriginal%20Australians%20are%201.5%20times%20more%20likely%20to,terms%20of%20incidence%20and%20mortality%20in%20Aboriginal%20Australians.](https://www.cancersa.org.au/research/cancer-statistics/#:~:text=Aboriginal%20Australians%20are%201.5%20times%20more%20likely%20to,terms%20of%20incidence%20and%20mortality%20in%20Aboriginal%20Australians.)

1. What would you like to see the Australian Cancer Plan achieve?

Vision that is ambitious

GSK Australia supports the Australian Cancer Plan including a vision of ambitious long-term goals designed to motivate.

A vision that is developed in partnership with patients, carers, health professionals, researchers, charities, industry and government. It would provide clarity on success. The vision would provide a destination guiding the Cancer Plan's aim's, actions and decision makers.

While the landscape in which the Cancer Plan operates is evolving, a vision would provide consistency and encourage focus on the ultimate goal achieving world-class cancer outcomes for all Australians.

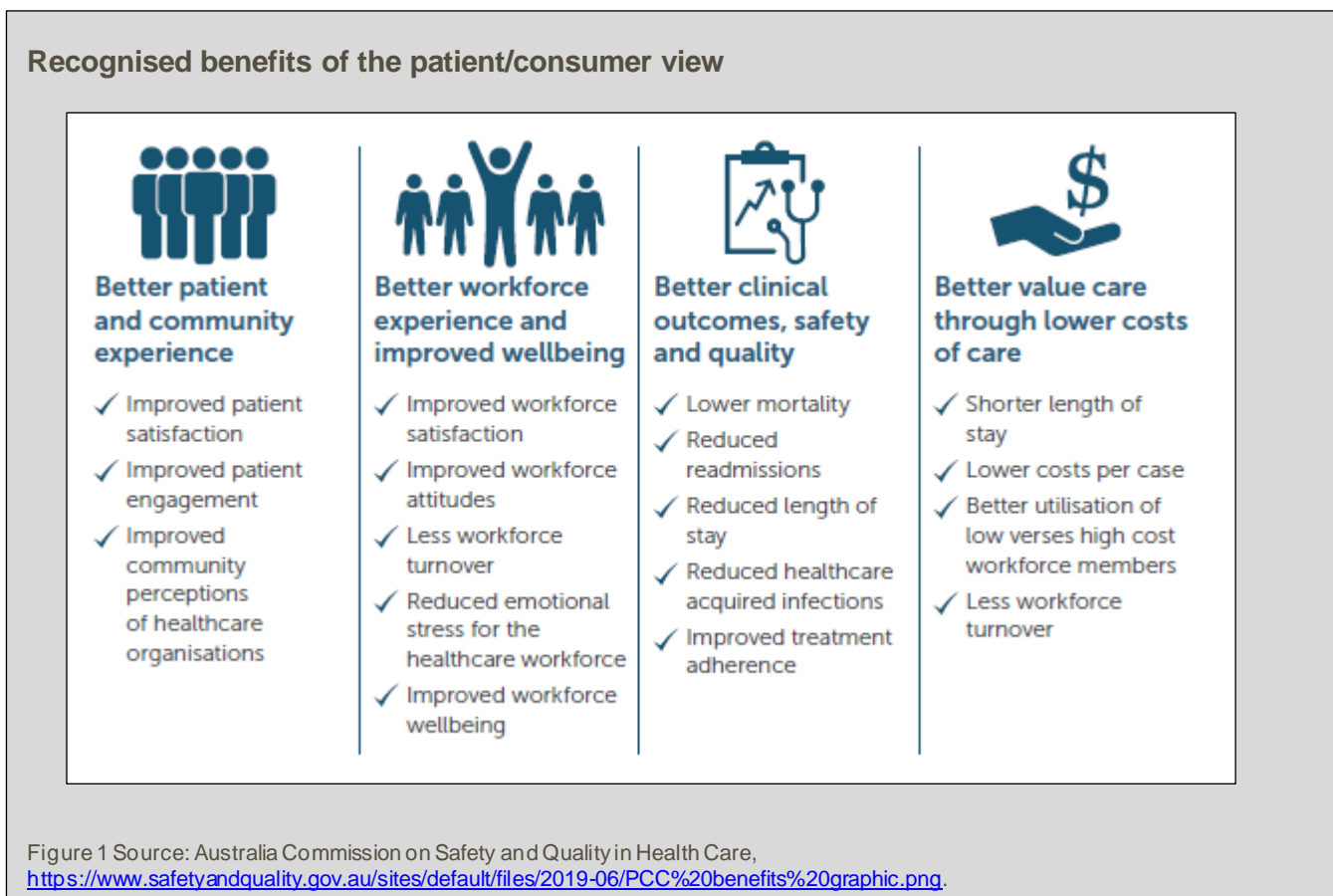
As a member of the National Oncology Alliance, GSK supports its united vision for cancer care:

- Australia has a fully patient centred health system.
- Patients have equitable, swift and affordable access to the best treatments and technologies.
- There is a greater than 90% survival rate across all cancer types and sub-types regardless of rarity.
- Australia has a thriving local biotechnology, pharmaceutical, medical technology industry.
- Australia is recognised internationally as a country that models best practice for cancer research, treatment and management⁴.

⁴National Oncology Alliance 2020. 'Vision 20-30, *Building an Australian Cancer Futures Framework*', https://rcarecancers.blob.core.windows.net/assets/pages/NOA_Vision20-30%20FA%20r4%20Digital.pdf

Commitment to patients being at the centre of the Cancer Plan, recognising the impact of cancer extends beyond the individual diagnosed

The benefits of incorporating a patient or consumer view are well recognised within the medicines sector and within established policy frameworks. This includes the Medicines Australia Strategic Agreement 2022-2027⁵ and Australia’s Long Term Health National Health Plan⁶. It is vital the Australian Cancer Plan reflect this commitment, define what meaningful engagement means, acknowledge its benefits and inspire mechanisms for enhanced consumer cooperation moving forward.



⁵Australian Government Department of Health 2021, 'Strategic Agreement in relation to reimbursement, health technology assessment and other matters', <https://www.medicinesaustralia.com.au/wp-content/uploads/2021/09/Medicines-Australia-Strategic-Agreement-2022-2027.pdf>.
⁶Australian Government Department of Health 2019, 'Australia's Long Term National Health Plan To Build The World's Best Health System', https://www.health.gov.au/sites/default/files/australia-s-long-term-national-health-plan_0.pdf

Empowering patients to drive decision making

Placing patients at the centre of cancer prevention, diagnosis treatment and support means delivering equity of access to understandable information to empower decision making, best medical teams and the support they need.

For this to be achieved, mechanisms are needed to enable enhanced, appropriate communications between researchers, the medicines industry, health professionals and the community.

Currently, regulations limit interactions between medicines developers and patients. This governance, while designed to protect patients may go too far in restricting interactions and can be detrimental.

We recommend the Cancer Plan support a framework for pharmaceutical companies to share locally relevant, scientifically accurate and balanced information on medicines with patient groups. This would equip patient groups to educate and support patients.

“Consumers will assume a ‘new power’. They will command convenience and access to high value, modern, personalised services that meet their needs. They will expect to have choice and control over the services they pay for. They will be activated more than ever with access to burgeoning information and innovations that will assist them to stay well,” Tony Lawson (Chair) and Leanne Wells (Chief Executive Officer), Consumer Health Forum.

Consumers Health Forum of Australia 2018, ‘Shifting Gears – Consumers Transforming Health’, pp 1, https://chf.org.au/sites/default/files/181125_shifting_gears_-_consumers_transforming_health.pdf.

Recognising the impact of cancer extends beyond the individual diagnosed

“Diagnosis and treatment of cancer can have a significant impact on you and the people close to you. A range of people may have supported you through your cancer journey – your partner, parents, children, friends, colleagues and other people with cancer⁷,” Cancer Australia.

It is important the far-reaching impact of cancer is recognised and embedded throughout the Cancer Plan.

The cancer journey can be long, and it can be challenging, it is important patients and their loved ones are provided with targeted support, delivered at times and in ways best suited to meet their needs. This includes support in understanding health information, navigating the health system, physical, mental health, social and financial needs.

⁷Australian Government Cancer Australia 2022, ‘Family and Relationships’, <https://www.canceraustralia.gov.au/impacted-by-cancer/family-and-relationships>

Recognising the funding of medicines and proven interventions are an investment in better health outcomes

Medicines are an essential component of achieving world-class cancer outcomes for all Australians.

The pharmaceutical industry contributes to the health and wealth of Australia, providing new treatments to prevent cancer, improve people's and save lives. Every innovative medicine made available in Australia generates a significant return on investment to the patient, community, economy and governments.

This 'value' must be recognised in the Cancer Plan to promote ongoing innovation and timely access for Australians. It would also support the maximisation of potential benefits from medicines investment to the Australian consumer and economy. GSK recognises there needs to be balance between investment in medicines and affordability to ensure ongoing sustainability of the health system and the industry.

The value in medicines and proven interventions

- More than 1 million Australians are currently living with or have lived with cancer.
- In 2021, 151,000 Australians are estimated to be diagnosed with cancer, by 2032 this number is expected to increase to 151,000.
- Proven interventions including prevention, screening and treatments have seen survival rates (at least 5 years after diagnosis) increase from 51% to 71% over the last 30 years (excluding cell carcinomas (BCC) and squamous cell carcinomas (SCC) of the skin).
- Cancer is the leading cause of burden (18%) of disease in the Australian population, it accounts for 7.2% of the \$117 billion disease-specific expenditure within the health budget.

Australia has strong foundations to build on. Cancer outcomes in Australia are among the best in the world. We lead the way in cervical cancer prevention, control and smoking cessation.

The Cancer Plan can build on established foundations, to strengthen and improve access to proven interventions across the care continuum resulting in a healthier Australia.

Australian Institute of Health and Welfare 2021, 'Cancer in Australia 2021'
<https://www.aihw.gov.au/reports/cancer/cancer-in-australia-2021/data>
Australian Institute of Health and Welfare 2020, 'Cancer',
<https://www.aihw.gov.au/reports/australias-health/cancer>

Commitment to partner with stakeholders in the development and delivery of the plan, including defined frameworks for governance, implementation and performance measures

GSK recommends the Cancer Plan include a governance framework, including partners and providing measures for assessing and reporting progress toward the vision and deliverables. It also requires defined mechanisms for ongoing informal and formal review, to ensure the Cancer Plan keeps pace with the needs and evolution of the environment. It will help make sure the Cancer Plan remains fit for purpose.

As recognised in the Cancer Plan consultation, across Australia, health professionals, charities and other organisations are working tirelessly to care for and support people affected by cancer. Researchers are seeking new ways of preventing, diagnosing, treating and living with the disease in all its forms. Governments, policy makers and industry groups are developing plans, frameworks and strategies to guide and shape future activity.

The Cancer Plan is designed to bring these stakeholders together, look for synergies and openings to developing and deliver a ground-breaking national plan to identify and address critical issues in cancer control.

Cancer's burden in this country is significant and its only together that we will improve health outcomes for all Australians.

By bringing partners together to agree on accountabilities, metrics, and formal mechanisms for review there will be increased transparency of the Cancer Plan, its impact and relevance.

A formal governance and accountability structure will encourage quality improvement. It will enable ongoing assessment, supporting adaption, prioritisation, effort and focus to deliver results.

2. What are the opportunities with the greatest potential to realise your vision?

The Cancer Plan has an important role in paving the way for breakthroughs in medicines and their access and translation into outcomes for Australian patients.

New research and new medicines are coming all the time. GSK alone has 15 assets in clinical development for cancer. To maximise the potential of this innovation, it must be translated into actions benefiting patients. This includes supporting medicines to be developed, trialled and delivered to the patients that need them.

Equitable, swift and affordable access to the best medicines.

Australian Government investment in medicines has not grown for a decade, while investment in other important areas of healthcare delivery like Medicare, hospitals and the National Disability Insurance Scheme has risen consistently.

On average it takes 537 days for a new cancer medicine to be registered on the Pharmaceutical Benefits Scheme (PBS) after its efficacy is proven and its registered by the Therapeutic Goods Administration (TGA)⁸.

“Treatment delayed is treatment denied for cancer patients,” Richard Vines Chief Executive Officer of Rare Cancers Australia.

Government has made efforts to expedite the approval of new therapeutic drugs in Australia by the TGA and increase alignment with overseas regulators to drive efficiencies. This has the potential to shorten the approval time for registration to around eight months instead of around 11⁹.

Unfortunately, the point of market entry or patient access in Australia is not at the point of registration. It is at the point of reimbursement, when the treatment is subsidised through the MBS.

Cancer medicines make up the largest proportion of new medicines registered in Australia by health area, they also have the longest average time-frame to reimbursement. TGA approval to PBS listing times range from 110 to 1650 days¹⁰.

Delays to access can have serious ramifications because cancer patients have urgent treatment needs due to the nature of the disease. Unlike some conditions, for which there is time to determine an optimal treatment path, cancer patients with terminal illness depend on immediate treatment.

The limitations of the current system are well recognised with work underway to review the National Medicines Policy, the Health Technology Assessment and consider the recent findings of the recently completed House of Representatives Standing Committee on Health, Aged Care and Sport; The New Frontier - Delivering better health for all Australians.

⁸ Medicines Australia 2019, 'Compare, Comparison of Access and Reimbursement Environments' https://www.medicinesaustralia.com.au/wp-content/uploads/sites/65/2020/11/0007_Med-Aus_Compare_5_Booklet_FA_HR.pdf

⁹ Australian Department of Health Therapeutic Goods Administration 2022, 'Fast Track Approval Pathways' <https://www.tga.gov.au/fast-track-approval-pathways>

¹⁰ Medicines Australia 2019, 'Compare, Comparison of Access and Reimbursement Environments' https://www.medicinesaustralia.com.au/wp-content/uploads/sites/65/2020/11/0007_Med-Aus_Compare_5_Booklet_FA_HR.pdf

It is important the Cancer Plan reflect and be reflected in broader government policy. This includes exploring new ways of driving efficiencies within medicines assessment systems:

- Encouraging international collaboration, alignment of assessment frameworks and data sharing.
- Provisional pathways to reimbursement.
- Evaluating evidence – formalising the patient role, considering provisional evidence, small studies and real world evidence.
- Broadening consideration of economic benefits – social and economic contributions of medicines and vaccines, including methods for productivity, participation and community (including carer impacts).
- Valuing interventions that prevent disease – reviewing the discount rate as it is currently applied.
- Supporting rapid translation of research into practice through mechanisms including living guidelines.

The Cancer Plan can set defined targets for equitable and swift access for all, actions will drive focus, accountability and impact.

Enabling innovation and global collaboration

Major regulators, including the TGA, will understandably insist that the expansive clinical trial data which goes into an initial drug application include a comprehensive number of patients from a variety of cultural backgrounds.

Medicines research, development, manufacture and supply is conducted globally, and this will only increase. This means that Australia cannot, and does not, operate in isolation from the rest of the world. Global considerations are frequently applied throughout the medicines systems and processes.

The Cancer Plan can entrench measures to incorporate a global view, to ensure we are learning from other jurisdictions and making evidence-based decisions to benefit Australians.

Currently, Australia has many strengths including its competitiveness in clinical trials, high quality basic research, and a relatively stable economic and democratic environment. However, medicines sector and environments across the globe are advancing and its important Australia progress also.

Recognising the importance of enabling innovation and global collaboration in the Cancer Plan along with providing support mechanisms for evolution and adaption will result in better outcomes for patients and a more sustainable research and medicines sector.

This includes formal supporting mechanisms for horizon scans, and reporting frameworks, harmonisation of clinical trials, sharing of data and resources, and living disease guidelines for increased efficiency and efficacy. With the ultimate result of new innovations translated into improved outcomes for Australian patients.

Optimisation of data collection, integration and transparency

Data on Australians health is being collected all the time, whether it be via electronic patient records, registries, and digital healthcare tools, such as those which monitor the patient's physiological symptoms.

The Cancer Plan can pave the way for this real-world data or evidence to be harnessed, by linking it to follow the patient journey and sharing it in an appropriate way. When used correctly, this information has the potential to enable more informed, evidence-based decision-making across the healthcare ecosystem to be translated into better health outcomes now and into the future.

Central to enabling the optimisation of data collection is national coordination, reflective of best practice globally. Currently, data systems are not designed to be linked. Some are the responsibility of the Australian Government; state and territory governments are responsible for others.

GSK supports Medicines Australia's recommendation of an update to the National Cancer Data Strategy (2008) in conjunction with development of the Australian Cancer Plan and the establishment of a National Cancer Registry supported by the Senate Inquiry: Availability of new, innovative and specialist cancer drugs in Australia 2015¹¹

Defined frameworks for governance, implementation and performance measures

As stated previously GSK strongly recommends the Cancer Plan include defined mechanisms for a governance, implementation, and a framework for assessing and reporting progress toward the vision and deliverables.

By bringing partners together to agree on accountabilities, metrics, and formal mechanisms for review there will be increased transparency of the Cancer Plan, its impact and relevance.

A formal governance and accountability structure will encourage quality improvement. It will enable ongoing assessment, supporting adaption, prioritisation, effort and focus to deliver results.

¹¹Australian Government Department of Health 2021, 'Strategic Agreement in relation to reimbursement, health technology assessment and other matters', <https://www.medicinesaustralia.com.au/wp-content/uploads/2021/09/Medicines-Australia-Strategic-Agreement-2022-2027.pdf>.

3. What examples and learnings can we build on as we develop the Australian Cancer Plan?

GSK strongly recommends the Cancer Plan include formal mechanisms for ongoing review and incorporation of best-practice, evidence-based interventions from Australia and across the globe.

Within Australia, there are many programs delivering results. This includes the Australian Genomic Cancer Medicine Program and the Zero Childhood Cancer Initiative; both have potential to be expanded.

Internationally, the UK Innovative Medicines Fund (IMF) is having success by giving patients early access to the most clinically promising drugs, particularly in cancer.

There are many programs emerging nationally, internationally or having an impact at a state or local level with potential to scale.

To maximise the potential lessons from these interventions, the Cancer Plan must incorporate horizon scans to ensure Australians health system keeps pace and Australians can benefit from the world's best interventions.

This would include ongoing mechanisms to consider:

- Academic reports
- Action Plans developed to combat disease
- State-based cancer plans.
- Stakeholder Insights
- Health system data.

Conclusion

GSK recognises the importance of the Australian Cancer Plan 2022-2033 and is aligned with its aim of achieving world-class cancer outcomes for all Australians.

We have welcomed the chance to explore the future of cancer prevention, diagnosis, treatment, care and support in Australia.

The Cancer Plan has a solid foundation to build upon. Advancements over the past 30 years mean more Australians are surviving cancer than ever before. But there is more to be done.

Development of the Cancer Plan can set out an ambitious vision for the future of cancer prevention, diagnosis, treatment and support, and guide the actions for us to get there.

It provides an opportunity to connect the thousands of health professionals, researchers, charities, researchers, government, industry groups from Australia and across the globe dedicated to improving outcomes from this disease. Together we can ask what is working well, where can improvements be made, and how can we encourage ongoing innovation? Together, we can unite behind the vision and solutions detailed in the Cancer Plan.

We can also develop agreed processes of governance, evaluation and review to ensure the Cancer Plan is achieving its aim ensuring accountability, focus and impact.

GSK looks forward to continuing to partner with stakeholders in development and delivery of the Cancer Plan resulting in a healthier Australia.

About GSK

GSK is a science-led global healthcare company with a special purpose: to help people do more, feel better and live longer. In Australia, we offer a broad portfolio of innovative and established vaccines and medicines in respiratory disease, HIV and oncology.

In Australia, we offer a broad portfolio of innovative and established medicines, particularly in respiratory disease and HIV. Our asthma medicines, for example, have been helping Australians to breathe easier for over 50 years.

Our vaccines have been at the heart of the Australian National Immunisation Program from the time it began, helping to protect infants and children from multiple serious diseases. Beyond childhood, our vaccines help to protect Australians throughout life whether at home or travelling overseas.

Australians probably know us best for our consumer healthcare products, spanning pain relief, specialist oral health, skin health, nutrition and digestion. Trusted brands like Panadol, Voltaren, Sensodyne, Polident and Otrivin have become household names.

For further information please visit au.gsk.com.

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