26 July 2013

The Submissions Officer
Department of Health and Ageing
Chemotherapy Review
MDP 901
GPO Box 9848
Canberra ACT 2601

To the Submissions Officer

Thank you for the opportunity to respond to the Department of Health and Ageing’s Discussion Paper regarding the Review of funding arrangements for chemotherapy services.

As Australia’s national cancer control agency, Cancer Australia is committed to reducing the impact of cancer and improving the wellbeing of people affected by cancer in Australia, and recognises the important role chemotherapy medicines have in achieving this vision.

Cancer Australia believes that the arrangements for chemotherapy services should be transparent and provide safe, equitable, and sustainable access to chemotherapy for all patients.

Cancer Australia’s comments in relation to the Discussion Paper will be focused on the third Term of Reference and are outlined below.

**Rural and regional chemotherapy provision**

Evidence indicates that there is a clear relationship between cancer mortality and cancer survival by geographic remoteness, with people living in rural and remote areas of Australia experiencing significantly higher mortality rates from cancer, and significantly lower survival rates:

‘The age-standardised mortality rate for all cancers combined was significantly higher in Remote and very remote areas (196 per 100,000) than in Major cities (171 per 100,000) in the years 2006-2010.¹

‘The five year relative survival rate for all cancers combined was higher in Major cities (67 per cent) and lowest in remote and very remote areas (63 per cent) in the years 2006-2010’.²

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² Ibid.
For this reason, Cancer Australia believes it is important that the needs of people living in rural and regional Australia are fully considered as part of the Review. The provision of chemotherapy services should be equitable and accessible to all Australians, regardless of where they live.

**Quality of infusion preparations**

Cancer Australia notes that medication safety is a significant issue in the delivery of chemotherapy medicines, due to the high potential for harm from these agents and the context in which they are being used.\(^3\)

In order for patients to have confidence in the quality of chemotherapy infusion preparations and access to best practice treatment and care, Cancer Australia supports the application of national standards relating to the provision of chemotherapy medicines. These national standards should include protocols for the safe prescribing, dispensing, administration, handling, and disposal of chemotherapy medicines.

Cancer Australia notes that guidelines relating to the provision of chemotherapy and related agents have been developed in Australia by the Clinical Oncological Society of Australia\(^4\), with input from other peak health organisations, including the Cancer Pharmacists Group, the Cancer Nurses Society of Australia and the Medical Oncology Group of Australia. These guidelines have been based on the best available evidence and expert opinion.

Cancer Australia is of the view that the application of national guidelines would contribute to the standardising of chemotherapy arrangements in Australia, and are an important tool in delivering safe and efficient cancer care.

Please contact Associate Professor Christine Giles on 02 9357 9404 or via email on christine.giles@canceraustralia.gov.au should you require any further information.

Yours sincerely

[Signature]

Professor Helen Zorbas AO
Chief Executive Officer

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\(^4\) Ibid.