

SUBMISSION - Inquiry into Improving Access to Medicinal Cannabis Bill 2023

The Department of Veterans' Affairs (DVA) supports the wellbeing of those who serve or have served in the defence of our nation, and families, by partnering with organisations and individuals to help design, implement and deliver effective programs and benefits, which enhance wellbeing of veterans and families.

DVA welcomes the Inquiry into Improving Access to Medicinal Cannabis Bill 2023. This submission presents information on its current policy on funding access to medicinal cannabis for eligible clients.

The Repatriation Pharmaceutical Benefits Scheme - subsidising access to medicinal cannabis

The Repatriation Pharmaceutical Benefits Scheme (RPBS) provides DVA clients (when a doctor prescribes the product), with access to a wide range of subsidised pharmaceuticals listed on its Schedule, as well as the Pharmaceutical Benefits Schedule (PBS) and other limited unlisted items where there is a clinical need.

DVA will consider funding and subsidising the cost of medicinal cannabis for eligible individuals, through the RPBS. That is, DVA funds the product and the pharmacy charges a co-payment to the client, the same as accessing other subsidised medicines through the PBS or RPBS.

Eligibility for funding for medicinal cannabis is considered for veterans who have a Gold or Orange Card, or White Card with an accepted condition, or related non-liability healthcare.

Funding medicinal cannabis for veterans is completed on a case-by-case basis through the RPBS in accordance with DVA's Medicinal Cannabis Policy Framework. This is through consideration of the information and supporting evidence provided by the client's medical practitioner.

DVA's Medicinal Cannabis Policy Framework

As a funder of health services for veterans, DVA has a requirement to ensure the safety and efficacy of services provided to clients. It also has an obligation to ensure appropriate use of public funds.

The Framework is based on assessments of efficacy, effectiveness and safety regarding the use of medicinal cannabis products. The Framework provides surety to the Australian Government that DVA is only funding use of medicinal cannabis where it is appropriate to do so and with high quality evidence in support of the treatment regime to address the health needs of the client (requiring ongoing medical oversight for treating the client for their condition).

Information regarding the DVA funding process for medicinal cannabis can be found at: www.dva.gov.au/providers/health-programs-and-services-our-clients/medicines/medicinal-cannabis-information

DVA's Medicinal Cannabis Framework

DVA may consider funding medicinal cannabis for its clients only under circumstances when:

- DVA has an existing liability to treat the medical condition, such as for Gold Card holders, for non-liability healthcare, and for accepted conditions;
- the amount of cannabis taken is determined by clinical need;
- the treatment is supported by several high quality scientific studies with very few or no credible opposing findings that it is effective in treating the condition;
- prescription and treatment is consistent with Australian peak professional bodies' clinical protocols and guidelines when issued or updated, as accepted by DVA;
- evidence-based standard treatments (if available and appropriate) for the condition have been attempted and have failed;

- The treating medical practitioner declares that:
 - medicinal cannabis is clinically indicated and may benefit the patient;
 - the medical practitioner has obtained all relevant state /territory/Commonwealth approvals, including TGA authorisations in order to make the prescription;
 - the medical practitioner has advised the patient of potential contraindications;
 - a suicide and mental health assessment has been undertaken in relation to medicinal cannabis and there is no increased risk from medicinal cannabis on suicide ideation or mental health; and
 - The patient has no current substance use disorder and has low risk for substance use disorder.

DVA will consider funding medicinal cannabis for the following health conditions without additional evidence provided:

- chronic pain (noting the inclusion of medicinal cannabis for pain treatment may result in less use of other pain medications, which can have more significant side-effect profile, such as opioid medications);
- chemotherapy-induced nausea and vomiting;
- palliative care indications;
- anorexia and wasting associated with chronic illness (such as cancer);
- spasticity from neurological conditions; and
- refractory paediatric epilepsy.

DVA applies a two-tiered approach to considering funding for medicinal cannabis, taking into account clinical, dosage (active ingredient) and regulatory factors, enabling a simpler assessment process for lower risk applications (over the phone approval) and adding further assessment steps for higher risk applications (written application), while noting that all applications need to meet the criteria of the DVA framework listed above.

<i>DVA Medicinal Cannabis Framework two-tier classification</i>	Tier 1:	Tier 2:
Number of Products	The client is receiving up to a maximum of two products at any one time.	The client is receiving three or more products at any one time.
THC Dosage	The client is receiving any product or products of equal to or less than 40mg/day THC, or no THC.	The client is receiving any product or products which contain over 40mg/day THC.
Health condition of the client	For health conditions being treated with medicinal cannabis, where DVA has already established that the treatment is supported under this Framework.	For other health conditions, where the application would need to provide evidence to support efficacy of this proposed treatment. Tier 1 health conditions if either of above Tier 2 circumstances exist.
	Telephone application accepted	Requires a written application

If an application for funding is approved, the prescribed medicinal cannabis products are funded through the RPBS. Typically, approvals of one month's supply are given and a quantity of repeats for Schedule 4 (TGA Category 1) products only.

The majority of applications received for consideration under the Framework have been for products with CBD as the active ingredient, followed by THC or THC/CBD combination products (the process allows for multiple medicinal cannabis products to be approved in a single application).

DVA medicinal cannabis applications

Since the start of the Framework in July 2018, DVA has considered just over 7,500 applications for medicinal cannabis, with 78 per cent approved for funding, at a cost of nearly \$17.5 million (as of 31 December 2022).

DVA has observed that there is an increasing demand for access to medicinal cannabis with the number of applications received significantly increasing every year, suggesting that medicinal cannabis is transitioning into a more 'mainstream' medication.

Barriers to access medicinal cannabis

DVA continues to work to reduce the barriers experienced by its clients when accessing medicinal cannabis. These barriers and relevant mitigations are outlined below.

- Shortage of medicinal cannabis products: the DVA approval process allows for product substitution if a particular product becomes unavailable.
- Financial barriers: through the RPBS, approved access requires veterans to only pay a concessional co-payment of \$7.30 per product.
- Lack of, or incorrect knowledge of medical practitioners and veterans about the uses and processes for prescribing and accessing medicinal cannabis in Australia: DVA continues to encourage the uptake of clinical protocols and guidance to on how medicinal cannabis should be prescribed and used from medical authorities, as they are developed for clinicians. With the evidence base for medicinal cannabis developing over time, the Framework has also been designed to accommodate future changes by outlining the types of evidence that would be acceptable for DVA funding, enabling DVA to be able to respond and adapt proactively to emerging evidence trends in the future.
- Stigma of use of medicinal cannabis within the medical and general community: DVA provides clear information on its website and to key stakeholders (including Ex-Service Organisational representatives) on the DVA funded access to medicinal cannabis for eligible veterans through the RPBS in accordance with DVA's Medicinal Cannabis Policy Framework.