



## Response to Public Consultation of the Discussion Paper Towards the National Immunisation Strategy 2025-30

Medicines Australia’s provided a response to the Department of Health and Aged Care’s public consultation on a new National Immunisation Strategy for 2025-2030 (the Strategy) via an online survey.

The public consultation is based on the document - Towards a National Immunisation Strategy 2025-2030 – which proposes a vision, mission, priority areas, and opportunities for action for the next Strategy.

Through an online survey, we provided the following responses to the ideas put forward in the consultation paper.

- 1. The proposed Vision of the new National Immunisation Strategy 2025-2030 (Vision) is: ***“To protect individuals and communities from the harms of vaccine-preventable diseases.”***

(Required)	Agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Disagree
To what extent do you agree with the Vision?					X

- 2. (Optional): Please provide further comments about your response, including any suggested amendments to the Vision.

Proposed amended Vision to enable clearer direction on expected preventative outcomes of the NIS:

*‘To prevent disease and severe outcomes of disease by maximising immunisation coverage in all people of all ages’.*

‘Immunisation’ is included to reflect non-vaccine immunisation strategies e.g passive immunisation in the form of monoclonal antibodies

*There is a limit of 300 characters*



**3. The proposed Mission of the new National Immunisation Strategy 2025-2030 (Mission) is:  
"Improve vaccine uptake and reduce impact of vaccine-preventable diseases in Australia."**

	Agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Disagree
<b>To what extent do you agree with the proposed Mission?</b>				X	

**4. (Optional): Please provide further comments about your response, including any suggested amendments to the Mission.**

Mission should be amended to better align with National Medicines Policy (NMP) key aim of equitable, timely, safe & affordable access to medicines:

*"Facilitate increased timely and equitable access, improve vaccine uptake and reduce the impact of vaccine preventable diseases for individuals and communities in Australia"*

*There is a limit of 300 characters*

**5. There are 6 proposed priority areas to achieving the proposed Vision for the new Strategy. Each of these priority areas are shown below.**

*Instructions: Please indicate how important you think each of the priority areas are.*

(Required)	Not Important	Somewhat Important	Important	Very Important	Most Important
Improve immunisation coverage through universal and equitable access to vaccination, with a focus on First Nations people.				X	
Strengthen community engagement, acceptance and understanding of immunisation.				X	
Strengthen program governance and how we manage programs and account to the public.				X	
Use data and evidence to target interventions, build confidence and improve outcomes.				X	
Strengthen the immunisation workforce to work with Australia's diverse population.				X	
Prepare for emerging infectious diseases and emergencies requiring rapid and/or targeted vaccination.				X	



6. (Optional): Are there any other priority areas you think should be included in the Framework?

Other Priorities:

1. Reduce time b/t registration to public funding.
2. Collaboration & partnerships all stakeholders
3. Strengthen vaccines ecosystem (eg R&D, public/ private partnerships, HTA) for security of onshore/offshore supply
4. Life course approach

(There is a limit of 300 characters)

## Part 2: Opportunities for action

There are declining trends in childhood vaccination, particularly among First Nations children. Improving access to vaccination across age groups and settings is critical to equitable service delivery and increasing coverage rates overall.

**Under priority area 1, the Strategy proposes opportunities for action that can improve immunisation coverage rates. These are summarised below.**

7. Please indicate how important you think each of these opportunities for action are.

(Required)	Not Important	Somewhat Important	Important	Very Important	Most Important	Not Applicable
Improve monitoring of vaccine coverage across all age cohorts, priority populations and at-risk groups. Use these data to drive performance and accountability.				X		
Prioritise partnership and shared decision making with First Nations communities and the Aboriginal Community Controlled Health Sector in delivering immunisation services.				X		
Build collaborative partnerships with communities with low immunisation rates, drawing on successful models from COVID-19 programs, particularly those designed for disability, First Nations, and Culturally and Linguistically Diverse communities.				X		
Continue to develop and adjust vaccination strategies to protect people in aged care, and				X		



residential care for people with disability.						
Make vaccines easier to access through immunisation programs and wider health system, especially primary care.				X		
Consider evidence-informed targets for specific vaccines or groups of people to focus national efforts during the implementation of the next National Immunisation Strategy				X		

8. Optional, if there any other opportunities for action that you think the Strategy should focus on to improve immunisation coverage? If yes, please note them.

Amend:

1. Improve data collection (eg eHealth records) & systems to coordinate, monitor & report...[all jurisdictions] & pop'n groups to drive performance & accountability
6. [Develop nationally consistent] & evidence-informed targets ... focus national & [jurisdictional] efforts...NIS

Add:

- Improve vaccines impact & monitor via disease surveillance
- Harmonisation of jurisdictions re pharmacy vax & have a nationally consistent program

(There is a limit of 300 characters)

Australia has several existing vaccination coverage targets embedded in national strategies. These include:

- 95% national childhood vaccination targets for all children and First Nations children at 1, 2, and 5 years.
- 90% Human Papillomavirus (HPV) vaccination target by 2030 for adolescents at age 15 years.

There is an opportunity to consider additional evidence-informed targets for vaccination coverage.

9. Should the proposed Strategy to 2030 have additional evidence- informed targets?

Yes

10. If YES, please provide a brief reason. Are there particular groups of people and/or vaccines that you consider it important to have evidence-informed targets? Please list them and provide a brief rationale.

Evidence-informed vaccination targets should be developed for all publicly funded vaccines. This would help drive performance and accountability across all age groups and risk based populations. Broader reaching targets will enable the NIS to have a genuine prevention and life course approach.

(There is a limit of 300 characters)

**Community confidence is integral to the acceptance, uptake and impact of immunisation programs and is positively influenced by a range of factors including codesign of programs and recommendations from health professionals.**

**Under priority area 2, the Strategy proposes several opportunities for action that can strengthen engagement, acceptance and understanding of immunisation supporting community confidence. These are summarised below.**

**11. Please indicate how important you think each of these opportunities for action are.**

(Required)	Not Important	Somewhat Important	Important	Very Important	Most Important	Not Applicable
Prioritise community partnerships and engagement design, delivery and evaluation of communication campaigns and information resources, using appropriate national, state and local mechanisms.				X		
Track community sentiment using behavioural insights among groups eligible for National Immunisation Program vaccines to inform communications and strategies and use this evidence to tailor policy and practice.				X		
Evaluate and report against the performance of vaccine awareness campaigns and other resources including performance in First Nations communities, priority populations and most remote/rural populations.				X		
Provide quality resources for a health workforce to respectfully engage with diverse individuals and communities on understanding and enabling vaccination.				X		
Consider the feasibility of a no-fault compensation scheme for Commonwealth-funded vaccines.				X		

**12. Optional, if there are any other opportunities for action that you think the Strategy should focus on to strengthen engagement, awareness and understanding of immunisation? If yes, please note them.**

Clear evidence for vaccine injury compensation scheme (VICS) in Australia, incl State/ Territory funded vaccines. Nation-wide VICS to ensure equitable & consistent coverage. VICS could be negot'd in next intergov'l agree't on essential vaccines.

Above actions should be explicit re improved public facing communications on importance of vaccination.

The governance arrangements for immunisation in Australia are robust, however, a number of advances in vaccine technology and transition of emergency immunisation programs to business-as-usual arrangements will require even stronger governance mechanisms into the future.

Under priority area 3, the Strategy proposes several opportunities for action that can strengthen program governance. These are summarised below.

**13. Please indicate how important you think each of these opportunities for action are.**

(Required)	Not Important	Somewhat Important	Important	Very Important	Most Important	Not Applicable
Shape the next intergovernmental agreement on essential vaccines to reflect shared vision of the National Immunisation Strategy				X		
Continue to deliver the national COVID-19 vaccine response while working with stakeholders to transition the COVID-19 vaccination program to a sustainable operating model.				X		
Strengthen accountability and generate evidence to inform improvement to programs and policy through transparent reporting against a monitoring and evaluation framework.				X		
Prepare for assessment of emerging vaccine technology and for the opportunities and challenges that adopting new technologies may present to existing immunisation programs and delivery.				X		

**14. Optional, If there are any other opportunities for action that you think the Strategy should focus on to strengthen program governance? If yes, please note them.**

Improve opportunities for collab'n b/t Gov, industry, with focus on timely access & adoption of vaccines:

Improve time from registration to funding of vaccines

Visibility of vaccine tender timelines

Qualitative value framework for PBAC

Real-world-evidence strategy

Develop with stakeholders, systematic & nationally coordinated horizon scanning

(There is a limit of 300 characters)



**15. What specific opportunities or challenges including those arising from advancements in vaccine technologies, delivery options and the availability of a wider range of vaccines, do you believe should be considered in shaping the new National Immunisation Strategy?**

Improve cross Govt collaboration between Health and Industry portfolios to drive investment in vaccines R&D, workforce & capability

Modernise regulatory & reimbursement policies/ processes (eg via HTA reforms)

Bring the community along, via clear and targeted information, to promote uptake of breakthrough vaccine technologies

*(There is a limit of 300 characters)*

**Australia uses vaccination coverage data and disease surveillance to monitor, evaluate and improve performance of Australia’s immunisation activities. Increasingly, these data can be used in more powerful ways to shape the design of targeted interventions.**

**Under priority area 4, the Strategy proposes several opportunities for action in leveraging data to target interventions, build confidence, and improve outcomes. These are summarised below.**

**16. Please indicate how important you think each of these opportunities for action are.**

(Required)	Not Important	Somewhat Important	Important	Very Important	Most Important	Not Applicable
<u>Boost compliance with mandatory reporting to the Australian Immunisation Register (AIR), while improving the quality and accuracy of AIR data.</u>				X		
<u>Expand the use of high-quality data linkage to inform specific policy or programmatic questions.</u>				X		
<u>Explore options to increase availability and accessibility of a range of timely population level vaccine coverage data from the AIR.</u>				X		
<u>Improve use of disease surveillance data with vaccine coverage data to better understand, respond to and mitigate risks of spread of vaccine-preventable diseases.</u>				X		
<u>Sustain robust vaccine safety systems including enhanced vaccine safety surveillance for new vaccine introductions.</u>				X		



17. Optional, if there are any other opportunities for action that you think the Strategy should focus on to leverage immunisation data? If yes, please note them.

Actions should include:

- Increase access to Australian Immunisation Register (AIR) for all stakeholders
- Improve timeliness, scope and granularity (eg age, risk based status) of vaccines uptake reported on AIR
- Collect Real World Evidence (RWE) to build evidence base
- Improve routine collection of CALD and ATSI status

*(There is a limit of 300 characters)*

The immunisation workforce is made up of many health professionals with varying roles, employment and training. Vaccination services need to be available in a diverse range of healthcare and community settings to ensure equitable access. Building a diverse workforce able to deliver culturally appropriate care on immunisation contributes to equitable access.

Under priority area 5, the Strategy proposes several opportunities for action to strengthen a diverse immunisation workforce. These are summarised below.

18. Please indicate how important you think each of these opportunities for action are.

(Required)	Not Important	Somewhat Important	Important	Very Important	Most Important	Not Applicable
Continue to improve availability and distribution of health professionals who are immunisation providers or who can support delivery immunisation programs.				X		
Improve cultural competence in professions and settings where vaccinations are delivered through awareness, training and appropriate resources.				X		
Build a more diverse immunisation workforce through support specific cadres of health professionals, including First Nations health practitioners, to work across a scope of practice that includes immunisation.				X		



**19. Optional, if there are any other opportunities for action that you think the Strategy should focus on to strengthen the immunisation workforce? If yes, please note them.**

Workforce and capability along the entire vaccines end to end supply chain should be strengthened (eg research and development, manufacturing, regulation, supply chain planning, HTA, data systems and policy research). Training and development opportunities needed to ensure the current and future workforce have the necessary skills to deliver for the Australian community.

The emergence of new infectious diseases and the re-emergence of vaccine preventable diseases due to declining coverage rates pose challenges. Additional and new vaccines may be required for management of infectious disease outbreaks and/or developed in response to novel pathogens. Australian governments need to maintain ongoing readiness for emergency vaccination rollouts.

**Under priority area 6, the Strategy proposes several opportunities for action to prepare for emergencies requiring rapid and/or targeted vaccination. These are summarised below.**

**20. Please indicate how important you think each of these opportunities for action are.**

(Required)	Not Important	Somewhat Important	Important	Very Important	Most Important	Not Applicable
Continue to plan for emergency vaccine rollouts.				X		
Strengthen immunisation research capabilities through domestic and international partnerships and funding.				X		
Maintain onshore manufacturing capacity for critical vaccines.				X		
Continue Australia's contribution to strengthening immunisation in the Indo-Pacific and globally.				X		

**21. Optional, if there any other opportunities for action that you think the Strategy should focus on to prepare for emergencies? If yes, please note them.**

*“Continue to plan for emergency vaccine rollouts” should be amended to “Ensure Government and Industry Coordination to Strengthen Medicines Supply Chains and vaccine roll outs”.*

*“Strengthen immunisation research capabilities...” should be amended to: Strengthen research capabilities along the vaccines end to end supply chain (including research and development, manufacturing, regulation, HTA, implementation and delivery and policy research) through domestic and international partnerships and funding.”*

The additional priority areas Medicines Australia proposed in the earlier questions should be adopted. Greater access to medicines is intrinsically linked to pandemic preparedness.

*(There is a limit of 6000 characters)*

### Part 3 Summary

Which of the following statements about the National Immunisation Strategy 2025-2030 are the most important to you?

#### The National Immunisation Strategy should:

#### 22. Please select up to 5 options.

(Required)

- Be promoted to reach health professionals, peak bodies, and/or researchers to increase awareness
- Be promoted to consumers and the general public to increase awareness
- Increase the focus on how organisations can work together to improve the effectiveness of immunisation-related activities in Australia
- Improve the collaboration between state and territory governments and the federal government
- Be more aligned with other state and territory, national and international policies, strategies and plans
- Focus on emerging risks and issues (e.g. ensuring preparedness for infectious disease outbreaks)
- Provide a greater emphasis on the needs of priority populations
- Drive immunisation reform at national level to improve health outcomes
- Ensure greater transparency of national and State and Territory actions to deliver priorities

#### 23. (Optional) Please provide any additional feedback on the Strategy not captured in your previous responses.

There are several policy and other key documents that the NIS 2025-30 should consider and align with where appropriate.

This includes the National Medicines Policy (NMP) which aims are to ensure:

- Equitable, timely, safe and affordable access to a high-quality and reliable supply of medicines and medicines-related services for all Australians.
- Medicines are used safely, optimally and judiciously, with a focus on informed choice and well-coordinated person-centred care.
- Support for a positive and sustainable policy environment to drive world-class innovation and research, including translational research, and the successful development of medicines and medicines-related services in Australia.

In addition, the Commonwealth and Medicines Australia Strategic Agreement 2022-27 have the shared goals of:

- (a) reducing time to access for Australian patients so that they can access new health technologies as early as possible; and
- (b) maintaining the attractiveness of Australia as a first-launch country to build on Australia's status as a world leader in providing patients access to affordable healthcare,



by ensuring that our assessment processes keep pace with rapid advances in health technology and barriers to access are minimised.

Key to achieving these goals is the recently completed review of HTA policies and processes. Improving HTA systems to be more efficient will incentivise innovator companies to bring their treatments to Australia and provide Australians faster access to new medicines. The NIS should incorporate strategies identified by the recently completed HTA review of methods and policies to improve timely access to vaccines. This includes valuing prevention and broader societal benefits of vaccines and streamlining HTA processes related to vaccines funding.

This is also a unique opportunity for all stakeholders to reflect on learnings from the global Covid-19 pandemic. The COVID-19 pandemic placed great pressure on pharmaceutical supply chains, with border closures and freight delays. Coordination between Medicines Australia, the TGA, other medicines peak bodies, and supply chain organisations, ensured the disruption of medicines supply was kept to a minimum during the pandemic.

As previously mentioned, and to re-iterate, the NIS should include the following additional priorities:

1. Reduce time b/t registration to public funding.
2. Improve Collaboration & partnerships between Government and industry, as well as all stakeholders along entire vaccines supply chain
3. Strengthen vaccines ecosystem (eg R&D, public/ private partnerships, HTA) for security of onshore/ offshore supply
4. Strengthen the life course approach to vaccines

Regarding the fourth additional priority, while substantial progress has been made in childhood immunisation in Australia and globally, the value of adult immunisation programmes is often overlooked. The burden of vaccine-preventable diseases is projected to rise, due to an ageing population and emergence of novel infectious diseases, which highlights the importance of robust adult immunisation programmes. Moreover, for infectious diseases such as shingles and pneumococcal disease, the incidence and severity of symptoms can increase with age, placing substantial burden on costly acute healthcare systems.

Finally, we would welcome the opportunity for industry to work with the Department of Health and Aged Care (DoHAC), all levels of government and other stakeholders to finalise and implement the NIS 2025-30. The Medicines Australia Vaccine Industry Group is a well-established industry led working group that would be well placed to be a key conduit to support the implementation of the NIS. We would welcome the opportunity to engage with DoHAC in the implementation of the NIS.

*(There is a limit of 6000 characters)*