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HTA Review Options Paper: Consultation feedback

Biointelect is a leading strategic planning and commercialisation advisory firm for the life science sector. We harness our global 360° view of the healthcare ecosystem to provide a dynamic approach and expert advice at each stage of the development pathway to accelerate innovation for patients. Biointelect has deep commercialisation experience in vaccines and welcomes the opportunity to contribute to the consultation process for the HTA Review.

We support the shared goals of reducing time to access for Australians so that they can access new health technologies as early as possible and maintaining the attractiveness of Australia as a first-launch country to build on Australia's status as a world leader in providing access to affordable healthcare.

The framework for HTA is a critical element in the end-to-end value chain for vaccines. The Commonwealth government makes significant investments in medical research and manufacturing with a goal of delivering health benefits for Australians and driving economic sustainability as well as supporting the region. The pandemic demonstrated that vaccine development times could be reduced from an average of 10-15 years down to 12-16 months[1]. Our track record in commercialisation needs improving and this will be further enabled if vaccines are appropriately valued, including long term benefits.

The National Medicines Policy includes principles of equity and access. The current discount rate of 5% is not consistent with this principle of equity. It disadvantages preventions or treatments given early in life. The discount rate should be lowered to 1.5% in line with comparable HTA countries. The reference materials for the HTA Options paper cited literature on the broader elements of value that should be captured in vaccine evaluation. These include reduced transmission of disease, outcome-related and behaviour-related productivity gains, herd immunity, equity, prevention of AMR and macroeconomic impacts.

An analysis by Shawview Consulting using data from the Maestro Database to examine the time taken for vaccines to be funded through the NIP showed that for those vaccine brands that were listed on the NIP and had a listed TGA approval date, it took on an average of 1,375 days to get listed after TGA approval, equivalent to almost four years.2 This is significantly longer than for other health technologies and needs urgent attention. Whilst the principles of streamlined pathways makes sense to shorten access times, there is insufficient detail on the broader role of ATAGI. The role and function of NITAGs are well described by WHO and should be maintained and strengthened.

We welcome the Departments of Health's Immunisation Policy and Partnerships Sections recent initiative to conduct horizon scanning meetings with industry, and support the strategic review of the NIP, including the review of listing and procurement processes. It is critical that this process also inform the HTA Review.

There is also disparity between jurisdictions for funding arrangements and differences in uptake rates between various age cohorts, vulnerable populations, including First Nations people and rural and remote communities. Previous strategies in the 1990's significantly increased childhood vaccination rates and similar actions are now needed to increase adult uptake rates and address vaccine hesitancy.

1. Kashte S, Gulbake A, El-Amin Iii SF, Gupta A. COVID-19 vaccines: rapid development, implications, challenges and future prospects. Hum Cell. 2021 May;34(3):711-733. doi: 10.1007/s13577-021-00512-4. Epub 2021 Mar 7. PMID: 33677814; PMCID: PMC7937046.

2. Shawview Consulting. 2021. *Valuing Vaccines: Ensuring Australia's access to vaccines today and tomorrow*, December, p.58, https://www.shawview.com/_files/ugd/8a9719_c61751a436ac49638ceed8b75cbf62af.pdf.