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To whom it may concern

National Digital Health Strategy Consultation

Thank you for providing Pfizer Australia with the opportunity to comment on the development of a *National Digital Health Strategy*. We welcome the Australian Digital Health Agency's leadership in setting out the priorities for national coordination and investment in this fast emerging area.

Pfizer Australia is one of Australia's leading providers of prescription medicines and consumer health products. We manufacture medicines and vaccines that millions of Australians use every day to live longer, healthier and more productive lives. We are proud of the active role we play in Australia's health system and the wider contribution we make as an innovator, employer and manufacturer.

Pfizer Australia strongly supports the use of digital health technologies to improve the efficiency and effectiveness of Australia's healthcare system. Of particular interest to innovative pharmaceutical companies like Pfizer Australia, digital health technologies provide a real opportunity to improve the quality use of medicines.

Pfizer Australia's submission (Attachment 1) responds directly to a selection of survey questions posed in the Discussion Paper. Thank you again for the opportunity to provide input into the strategy development process. Pfizer Australia is available at any time to provide further information as required.

Yours faithfully

A handwritten signature in black ink, appearing to read "Melissa McGregor".

Melissa McGregor

ATTACHMENT 1

Submission to the Digital Health Agency's public consultation to develop a National Digital Health Strategy

(a) What are your organisation's priorities in respect to digital health or eHealth?

Pfizer Australia strongly supports the use of digital health technologies to improve the efficiency and effectiveness of Australia's healthcare system. For innovative pharmaceutical companies like Pfizer Australia, digital health technologies provide a real opportunity to:

- **Improve the quality use of medicines** by supporting patient medication adherence; making it easier to monitor the outcomes of selected treatment options; and creating more interactive, informative and engaging educational materials for healthcare providers.
- **Empower patients** by providing them with additional resources and support to better understand their medicine and to manage their treatment more easily and efficiently.
- **Accelerate access to new, innovative medicines** by improving the efficiency and effectiveness of patient recruitment for clinical trials, as well as the subsequent collection, storage and analysis of data in clinical trials.

In pursuit of these opportunities, Pfizer Australia is investing in a number of digital health technologies. A small selection of our current initiatives in this area includes:

Product	Description
CareMate	CareMate is a mobile application developed by Pfizer, which supports kidney cancer patients to manage their treatment, with capability to send reports to their carers or healthcare providers.
Haemophilia Dosing Assistant	The Haemophilia Dosing Assistant is a mobile application developed by Pfizer to assist healthcare professionals with the dosing and administration of Pfizer Australia's haemophilia products.
XalkoriVR	XalkoriVR is an interactive educational tool developed by Pfizer that uses Virtual Reality (VR) to increase healthcare professionals' knowledge and understanding of diagnostic testing options prior to prescribing certain cancer treatments. The application is designed to be stored on a smart phone and used in conjunction with VR headsets.
Kardia	Developed by US health technology firm, AliveCor Inc, Kardia is a mobile EKG (smaller than a credit card) that can also help patients track palpitations, shortness of breath, dietary habits, sleep and exercise patterns through an associated mobile application. To support our commitment to the quality use of medicines, a doctor surgery can request to loan a Kardia device from Pfizer Australia for a set period. Other support material for health providers and patients is also provided with the loan device.
PfizerMeds	By simply scanning or entering the barcode on a Pfizer prescription medicine pack, the Pfizer Meds mobile application gives consumers access to information about the medicine and associated medical condition (e.g. videos on how to correctly take/use the medicine).

(b) What are the barriers or obstacles to innovation in health and care?

Pfizer Australia has experienced the following barriers/ obstacles in our pursuit of digital health technologies:

- **Lack of supporting infrastructure:** Most digital health technologies rely on some form of enabling ICT infrastructure, the most common of which is access to reliable, high speed internet. Unfortunately, access to quality ICT infrastructure varies greatly across Australia, particularly between urban and rural/regional areas.

- **Few local vendors with the required expertise:** Developing and maintaining digital health technologies is resource-intensive, expensive and highly specialised. Because of this, Pfizer Australia rarely develops such technologies in-house, preferring to either commission the work externally or invest in an existing product. It can be challenging, however, to find local vendors who have the required expertise in medical sciences as well as digital technologies /data analysis to undertake these projects. It can also often be more economical to engage vendors offshore.
- **Unclear reimbursement pathways:** There is currently no framework for linking digital health innovations to the Australian reimbursement system. This can impact physician and consumer uptake (e.g. it could be difficult to encourage patients and physicians to engage with technologies such as telehealth if the service is not covered under Medicare). Without a clear path towards commercialisation and integration into the broader healthcare system, early stage digital health innovations can fail to progress.
- **Partnering opportunities:** Innovative pharmaceutical companies are not traditionally regarded as a partner in digital health. Because of this, we are often omitted from multi-stakeholder forums that address digital health. We are confident that our industry can add real value to these forums and would welcome an opportunity to contribute to the conversation. Pfizer Australia encourages the Australian Digital Health Agency, for example, to consider expanding its newly formed Medicines Safety Program steering committee to include a representative from our peak industry body, Medicines Australia.
- **Privacy concerns:** Consumer privacy concerns remain a real barrier to promoting uptake of digital health technologies. Privacy concerns can also limit innovation from a design/supply perspective. Pfizer Australia, for example, avoids capturing personal and identifiable information through our various mobile applications to be compliant with local privacy policy, and this, in many ways, limits each application's potential utility. While we acknowledge and respect the need for privacy regulation, Pfizer Australia would welcome a broader conversation with Government and other key stakeholders to discuss the various advantages and disadvantages differing degrees of the regulation might deliver. We note that other high data-risk industries have made meaningful progress in this area in recent times (e.g. finance and banking) and believe the healthcare industry could learn from this experience.

A number of the barriers /obstacles listed above have also been identified in the medical technology and pharmaceutical industry's *Sector Competitiveness Plan*, published by MTPConnect earlier this month, which lists "supporting the development of digitally enabled medical technology and pharmaceutical solutions, devices and data analytics" as one of seven growth priorities for our industry. Pfizer Australia supports the Plan and encourages the Australian Digital Health Agency to review the relevant insights and recommendations provided within.

(c) What should be the immediate priority initiative for the My Health Record to ensure it delivers real value for clinicians and the public?

To ensure the My Health Record delivers real value for clinicians and the public, Pfizer Australia recommends Government:

- Continue to support a pathway to a default 'opt-out' system, rather than the existing 'opt-in' system, to drive uptake
- Ensure the scope of the My Health Record covers all areas of a patient's engagement with the health system, including both within and outside of the MBS and PBS structures
- Ensure the system is capable of producing accessible, de-identified datasets to assist stakeholders in identifying and anticipating health trends and encourage evidence-based policy making; and

Consider future interoperability opportunities - for example, will the system allow consumers to upload relevant data from medical applications on their mobile phones/devices to their eHealth record?