

20 October 2025

Public Health Network & Programs | Community & Public Health Division  
Department of Health  
50 Lonsdale Street  
Melbourne, 3000  
Victoria, Australia

## Re: Consultation on Victorian Immunisation Strategy 2026–2030

Thank you for the opportunity to provide feedback on the *Victorian Immunisation Strategy 2026–2030*. Every year 22 million Australians visit their General Practitioner (GP) for high-quality healthcare, making GPs the most frequently accessed health professional in the country. Specialist GPs are integral to state vaccination programs, with the vast majority of all vaccines, including childhood vaccines, delivered in general practice. Our comments in response to the two questions for feedback are below.

### To what extent do the proposed priorities and objectives in the draft strategy align with your experience and expectations?

- There is broad alignment with expectations and the National Immunisation Strategy 2025-30.
- The RACGP provided feedback on the Discussion Paper Towards the National Immunisation Strategy 2025-30, which you can [see online here](#).

### Are there any additional priorities or objectives you feel should be considered for inclusion within the strategy?

- There needs to be stronger emphasis on reversing the decline in vaccination rates as a strategic objective. There is increasing risk of serious harm including preventable deaths if the decline in vaccination rates continues, with a resurgence in preventable diseases such as measles. In Australia, measles cases this year [already exceed the total cases for 2024](#).
- GPs provide holistic care through all stages of a patient's life. The ongoing and trusted relationship GPs have with their patients means they are best placed to provide vaccinations, and to address vaccine hesitancy and misinformation and encourage vaccination uptake.
- As such, we would like to see a strategic objective to support and empower GPs to spend time targeting vaccine hesitant patients, and to have respectful conversations addressing patients' concerns, and encouraging vaccination.
- Enabling pharmacy vaccinations only benefits patients with no hesitancy issues and does not address declining vaccination rates. Vaccinations performed by pharmacists can present safety issues because it reduces opportunity for coordinated comprehensive care in general practice, adds to health system complexity, and fragments care. Fragmenting healthcare has been shown to be less safe and more expensive than models that facilitate continuity of care.



- We strongly support the objective to ‘*Maximise equitable access to immunisations for Aboriginal and Torres Strait Islander people and other priority populations*’ and encourage consultation with Victorian Aboriginal Community Controlled Health Organisation Inc (VACCHO) as a key stakeholder in Aboriginal and Torres Strait Islander health.
- [The NACCHO-RACGP National guide to preventive healthcare for Aboriginal and Torres Strait Islander people](#) is an important evidence base to refer to for immunisation. Strategies to address the social and environmental determinants of health must also go hand-in-hand with immunisation as key strategies to reduce rates of infectious diseases.

## Conclusion

RACGP Victoria strongly supports the aim of the *Victorian Immunisation Strategy 2026–2030* to reduce the impact of vaccine-preventable disease by increasing equitable coverage, strengthening public trust, and enhancing system-wide preparedness through innovation, workforce capability, and collaboration. While recognising that this is a high-level strategic document, we believe it should explicitly spell out that reversing declining vaccination rates is a strategic objective and GPs need to be empowered and supported, as those best placed to help achieve this objective at the ground-level.

We thank you for the opportunity to contribute to this consultation and would welcome ongoing engagement as the framework is refined.

Yours sincerely,

**Dr Anita Muñoz**  
Chair, RACGP Victoria