

16 June 2026

Pharmaceutical Benefits Scheme
Department of Health, Disability and Ageing (the Department)

Via email: PBScostrecovery@health.gov.au

Dear the Department,

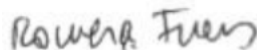
Re: Public Consultation: Draft 2026-27 Cost Recovery Implementation Statement for listing medicines on the Pharmaceutical Benefits Scheme and designated vaccines on the National Immunisation Program

The Royal Australian College of General Practitioners (RACGP) thanks the Department for the opportunity to provide feedback on the Draft 2026-27 Cost Recovery Implementation Statement (CRIS). We provide the following comments for consideration.

The RACGP notes the availability of a fee waiver option. It is important that flexibility is maintained, when fees may present a barrier for organisations to provide submissions, particularly when the medicines are for public benefit. This includes waivers for applications for repurposed medicines, off-patent products, and treatments for rare or low-volume conditions. Flexibility in fee waivers will help ensure applications are not discouraged where commercial incentives are limited, and that patients can benefit from emerging evidence and established therapies used in new ways.

Thank you again for the opportunity to provide feedback. If you have any questions, please contact Mr Stephan Groombridge, National Manager, Practice Management Standards & Quality Care at Stephan.groombridge@racgp.org.au or (03) 8699 0544.

Yours sincerely



Professor Rowena Ivers

Deputy Chair, RACGP Expert Committee – Quality Care