



ATSA Submission to the Department of Health and Aged Care –
Therapeutic Goods Administration

Fees and Charges Proposal 2024-25

21 February 2024

Assistive Technology Suppliers Australia

02 8006 7357
www.atsa.org.au

margaret.noonan@atsa.org.au

Contents

Contents	2
Who is the Assistive Technology Suppliers Australia?	3
Recommendations	4
Introduction	4
Comments from ATSA	4
Closing.....	5
References	5

Who is the Assistive Technology Suppliers Australia?

ATSA is the peak national organisation representing assistive technology suppliers, including manufacturers, importers, distributors, retailers, tradespeople and technicians.

Our 170 members comprise businesses and not-for-profit organisations and range from small family-owned concerns to multinational organisations throughout Australia. It is estimated that, excluding AT for communication and sensory disabilities, approximately 80% of the AT in Australia passes through the hands of ATSA members.

ATSA is a registered not-for-profit charity with the ACNC and requires its members to adhere to a comprehensive Code of Practice on the provision, sales and servicing of AT. We are also a member of the Australian Ethical Health Alliance.

The objects of ATSA are

- (a) funding and promoting:
 - i) research into Assistive Technology;
 - ii) the education of the public as to the availability of Assistive Technology to meet the needs of persons with a disability;
 - iii) "Best practice" in the way Assistive Technology is supplied; and
 - iv) community accessible Assistive Technology events;
- (b) giving the Assistive Technology users and suppliers a voice that:
 - i) provides positive influence on Government policy;
 - ii) educates Governments and other stake holders about Assistive Technology;
 - iii) promotes a robust competitive and commercially viable marketplace with the aim that Assistive Technology is available to users at a reasonable cost;
 - iv) advocates to achieve excellence, quality, value and positive outcomes for suppliers, Assistive Technology users, stakeholders and the broader community;
 - v) works with governments at all levels to ensure the viability of the Assistive Technology industry for the sake of those who use Assistive Technology; and
 - vi) delivers quality and value in Assistive Technology solutions for people with a disability and their carers;
- (c) improving the quality of Assistive Technology provision by:
 - i) supporting the ongoing training and education of health care professionals;
 - ii) promoting ethical business practices that safeguard the interests of users of Assistive Technology;
 - iii) participating in the development of appropriate and cost-effective product standards; and
 - iv) maintaining and enhancing services standards, quality and reputation of the Members for the collective mutual benefit and interests of the Members and the public;
- (d) developing alliances with all industry stakeholders to:
 - i) drive continued improvement in outcomes for Assistive Technology users;
 - ii) minimise the total lifetime costs of Assistive Technology on society and Assistive Technology users;
 - iii) ensure an open, fair and competitive market; and
 - iv) promote the services, activities and events of the Company; and
- (e) undertaking such other actions or activities that are necessary, incidental or conducive to advance this Object.

Recommendations

Recommendation 1

The allocation of costs from the Digital Transformation project be reviewed with consideration for other stakeholders who benefit from the outcomes of this project.

Recommendation 2

The RegTech group meet to review the 1997/98 Budget, Budget Paper No.2 and Part II: Revenue Measures to understand key stakeholders by activity and if agreed, make a recommendation to the Minister for Health for cost allocation to be updated.

Introduction

ATSA thanks the Therapeutic Goods Administration (TGA) for the opportunity to be informed of, and respond to, the proposed fee increases for the 2024-25 period. ATSA understands that increases are necessary in order to meet rising wage and other associated business costs, however is concerned about the allocation of costs to sponsors/manufacturers without due consideration of other stakeholders who benefit from work undertaken by the TGA.

Comments from ATSA

With regard to the allocation of the Digital Transfer costs to sponsors and suppliers, ATSA understand that \$12m was allocated to this project from the Minister for Health, and that the rest of the expenses will be allocated to sponsors/manufacturers over a six year period.

Whilst industry will be one of the beneficiaries of this project, there are other stakeholders who also benefit. These include State and Territory Health Departments, Health Professionals, Health Researchers and consumers as well as Federal government¹.

This raises the question as to why one stakeholder group is taking the full responsibility for the cost of this project, less the \$12m from the Minister for Health in 2020?

ATSA recommends the costs for this project be weighted across the stakeholder groups, noting that Federal government and consumers would be covered by the \$12m.

In regard to the UDI costs, ATSA acknowledges that the process for cost allocation proposed by the TGA is similar to that used in the European Union and the USA.

We also note the Fees and Charges paper makes reference to a budget decision made in 1997/98 (26 years ago.) Much has changed since that time, and we recommend the TGA and RegTech Group develop updated recommendations on the process for activity based cost allocation by beneficiary for presentation to the Minister for Health. By placing the burden for all costs on industry the following risks arise:

- Innovation of new medical devices may be reduced due to higher fees and charges.
- Industry is encouraged to limit devices and medications they 'buy', which in turn limits options for health professionals and patients/consumers.
- Without the international volumes to offset the increases it is likely that local industry will be disadvantaged financially.

Closing

ATSA requests the cost allocation for the Digital Transformation project be reconsidered with cost allocations to include other stakeholders excluding industry and consumers.

References

¹[presentation-learn-about-the-transformed-new-website.pdf \(tga.gov.au\)](#)