24 May 2017

Danae Staples-Moon
Therapeutic Group Manager
PHARMAC
PO Box 10254, Wellington 6143

Email: consult@pharmac.govt.nz

Dear Ms Staples-Moon,

Proposal of 8 May 2017 to amend funding criteria for nivolumab (Opdivo) and pembrolizumab (Keytruda)

We are writing on behalf of MelNet, Melanoma New Zealand and the Cancer Society of New Zealand to provide feedback on the proposal to amend the nivolumab (Opdivo) and pembrolizumab (Keytruda) funding criteria for treatment of patients with advanced melanoma by adding the requirement that eligible patients should have an ECOG performance status (PS) score of 0-2.

Our organisations oppose the proposed restrictions as we are unaware of new evidence showing that patients with a PS of >2 do not benefit from nivolumab (Opdivo) and pembrolizumab (Keytruda) treatment. In our view, this lack of evidence should be considered alongside the small number of patients involved as well as the absence of other treatment options for them. in the spirit of fairness and equity, we believe that the decision to offer such treatments should remain with the clinician and patient rather than on the basis of a PS assessment (which also can be open to subjective interpretation).

In our view the absence of new data to support the proposed funding restrictions highlights the need for PHARMAC to monitor the current use of nivolumab (Opdivo) and pembrolizumab (Keytruda) among patients with advanced melanoma in New Zealand. Such monitoring would lead not only to a better understanding of the treatment benefits but also its toxicity. Together we would welcome the opportunity to work with you in analysing the data that currently are being collected with a view to informing future funding policy decisions.

Yours sincerely,

Gary Duncan MBChB, FRACS	Linda Flay	Chris Jackson
Chair	CEO	Medical Director
MelNet Executive Committee	Melanoma New Zealand	Cancer Society of New Zealand

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