



31 July 2025

Commissioners Jackson and Button
Productivity Commission
Locked Bag 2, Collins St East, Melbourne Vic 8003, Australia
Wurundjeri, Woi wurrung country
Via [webform](#)

Dear Commissioners Jackson and Button,

VTPHNA submission to the Productivity Commission's Interim Report into the review of the National Mental Health and Suicide Prevention Agreement

Noting the release of the Productivity Commission's Interim Report into the review of the National Mental Health and Suicide Prevention Agreement (NMHSPA), and the call for submissions in response to the release of the Interim Report, we provide a response as the Victorian and Tasmanian PHN Alliance (VTPHNA).

We acknowledge the Commission's thorough analysis and its recognition of the challenges facing Australia's mental health and suicide prevention system. In addition, we recognise the Commission's efforts to critically examine the NMHSPA and its implementation.

A strong interim report on the right track

VTPHNA commends the following aspects of the Interim Report:

- **Recognition of Fragmentation:** The report accurately identifies systemic fragmentation and the need for integrated, person-centred care. VTPHNA supports the emphasis on whole-of-government collaboration and the call for clearer governance and accountability.
- **Focus on Co-Design and Lived Experience:** The Report's commitment to embedding lived experience in governance and service design is welcomed. VTPHNA has long advocated for inclusive, trauma-informed approaches and support the development of a peer workforce with a nationally consistent scope of practice.
- **Call for National Guidelines:** The recommendation to release detailed National Guidelines on Regional Planning and Commissioning, and National Mental Health and Suicide Prevention Evaluation guidelines, is strongly supported. PHNs are well-positioned to lead regional planning and commissioning, and we welcome the opportunity to co-develop these guidelines.
- **Support for Outcome-Based Reporting:** The emphasis on transparent, outcomes-focused reporting and the role of the National Mental Health Commission in monitoring progress aligns with VTPHNA's commitment to accountability and continuous improvement.

Areas for further focus

While the report is comprehensive, VTPHNA believes there are areas that will benefit from further attention:

- **Clarify Integration:** The concept of integration needs clearer definition to support operationalisation. There are varying understandings of integration across sectors and this may lead to different interpretations of the Report's recommendation for greater integration. VTPHNA recommend a multi-



level integration framework, from system to service level, and propose PHNs' facilitative roles in driving cross-system collaboration.

- **Leadership and Cultural Reform:** System reform requires more than structural change—it requires cultural transformation and leadership at all levels. The Report could more explicitly address the need for change leadership, particularly in service organisations. PHNs can play a role in supporting this leadership at the regional level.
- **Reform Governance Structures:** Governance must extend beyond national and state levels to include regional mechanisms. The current governance structures do not adequately reflect the importance of place-based decision-making. VTPHNA recommends place-based governance layer that includes PHNs, state-funded services, and lived experience representatives. This would ensure practical translation of policy into local action.
- **Psychosocial Supports Outside the NDIS:** VTPHNA disagrees with the recommendation that all psychosocial funding flow to state and territory governments. PHNs have demonstrated capacity to commission into service gaps and integrate psychosocial supports with clinical care and primary care. A shared commissioning model is needed, with PHNs continuing to lead in areas where they have established expertise and relationships.
- **Align National and Jurisdictional Strategies:** A renewed National Mental Health Strategy should see updated and aligned state and territory plans. PHNs can assist in bridging these strategies through their systems thinking with jurisdictional and regional understanding.
- While we note Productivity Commission's the preference for extending the current Agreement for another year to allow sufficient time to build strong foundations for the next agreement, we ask that the Commissioners consider the potential benefits of aligning the next Agreement (NMHSPA) with the next iteration of the National Health Reform Agreement (NHRA). There could be substantial advantages if these two agreements could be brought further in line with one another. For example, this could support better whole of system planning, stronger connections between acute care, primary care and mental health systems, better consumer experiences, and allow for stronger more interconnected jurisdictional governance structures to support the implementation of the agreements.

VTPHNA a Partner in Reform

VTPHNA is ready to contribute to the next phase of reform. We offer the following:

- **Strategic Engagement:** VTPHNA CEOs are available to meet with Commissioners to discuss regional governance, integration frameworks, and commissioning models.
- **Co-Design Partnership:** VTPHNA is keen to partner with stakeholders to support the co-design the next agreement and associated schedules.
- **Data and Evaluation Collaboration:** PHNs support the development of a national data repository and public dashboard and are ready to contribute datasets and expertise to ensure meaningful, regionally relevant metrics.

We look forward to further engagement and opportunities to support the Productivity Commission in developing its full report to support improved mental health and suicide prevention activities for all Australians

Yours sincerely,

Christopher Carter
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2025 Chair, Victorian and Tasmanian PHN Alliance