



Citizens Committee on Human Rights Inc.

The Australian National Office of the international organization the Citizens Commission on Human Rights™
Established in 1969 by the Church of Scientology to investigate and expose psychiatric violations of human rights

Founding Commissioner
The late Prof. Thomas Szasz M.D.
Professor of Psychiatry Emeritus

27 February 2020

Professor Stephen King
Presiding Commissioner
Mental Health Inquiry
Productivity Commission
Level 12, 530 Collins Street
Melbourne Vic 3000

Dear Professor King,

I wrote to you on the 17th January in reply to your 14th January letter regarding the recommendations in the Productivity Commission's Inquiry into Mental Health Draft Report essentially placing 1.25 million zero to three year old children at risk of being prescribed psychiatric drugs. My letter was received by you as I phoned to confirm it had been passed on. I was also emailed by an Associate Commissioner on 22nd January advising me you were considering it. To date I have not received a reply. Below again are CCHR's concerns and questions from our letter:

1. Can you categorically refute and deny the proposed testing will not conceivably lead to prescription of ADHD drugs, antidepressants, antipsychotics or other psychotropic drugs to infants and toddlers?
2. The *Freedom of Information Act* request CCHR filed with the Productivity Commission shows the Commission and the Mental Health Inquiry personnel do not have a copy of the failed and scrapped 2015 Enhanced Healthy Kids guidelines and materials which it now proposes to be used in the Draft Report to screen 3-4 year olds.¹ The Draft Report erroneously says that the Enhanced Healthy Kids Check was never rolled out. However, the *Medical Journal of Australia* reported it was trialled at 8 Medical Locals.² [Volume 2, p.658]

Please explain the discrepancy here and how the Commission can propose the use of guidelines and materials if they've apparently not read them?

3. The rising statistics of psychiatric child drugging are the cold hard facts. They show there is more drugging of infants and children. There were 53 infants under age 1 on a psychiatric drug in 2007/09. The Department of Health stopped providing the numbers of children on psychiatric drugs by age, under age 6. But by 2015, there were 7,817 children aged 2-6 on a psychiatric drug.³
4. Has the Mental Health Inquiry's Commissioners obtained the current statistics for the numbers of babies and infants on psychiatric drugs in Australia and investigated the prescribing to 0-3 year olds? If not, will it do so and undertake a thorough and proper investigation of this matter?
5. Has the Commission determined if those children aged 0-3 years old placed on psychotropic drugs, had been screened or diagnosed with a disorder from *DC: 0-5*? Has it investigated the reasons for why all National Mental Health Strategies to date, by the very nature of the Productivity Commission's Mental Health Inquiry existence, have failed? In both cases, if not, will it do so and undertake a thorough and proper investigation into this matter?
6. Has the Commission investigated the Adverse Drug Reports of psychotropic drugs filed with the TGA and prescribed to young and adult Australians, and whether existing, especially government funded youth programs, have apparently not stemmed the tide of youth emotional problems?

7. Will the Commission categorically state that its recommendations do not endorse the psychotropic drugging of those aged 0-3 and that it was never intended to imply this?
8. In regard to Prof. Harvey Whiteford, CCHR's concern is the choice made for an Associate Commissioner. He designed and oversaw implementation of Australia's National Mental Health Strategy (which commenced in 1992). Clearly, this has not curbed the mental health crisis the Productivity Commission is now addressing, admitting "there is very little information to allow us to determine whether investments in mental health and wellbeing are delivering improvements and what policy initiatives have been effective." Surely, this is vital information to ensure there's not more investment into unworkable or ineffective programs. What are the results as far as declining rates of mental ill-health from Prof. Whiteford's National Mental Health Strategy?
9. Between 2008 and 2012 alone, Prof. Whiteford's company, Harvey Whiteford Medical PTY LTD, *did* receive more than \$1.1 million from the Department of Health for providing planning and services for national mental health reform etc. CCHR makes no apology for providing the public with the facts they deserve to know about Prof. Whiteford. Indeed, it begs the question, in light of your 14th January letter, is there not more funding his company has received that the public may be unaware of? In light of the above is there not a perceptual problem?

I request a reply to CCHR's letter and request again that you publish CCHR's letter of 17th January 2020 next to yours on the "Make a submission," "Make a brief comment," "View submissions and comments" and "Submissions focused on early childhood development," pages of your website as an accurate representation of our concerns and, therefore, in their proper context or that you remove your letter dated 14th January 2020 from these webpages.

I am available should you also wish to discuss this matter by phone or in person.

Sincerely,

Shelley Wilkins
Executive Director

¹ "Your Freedom of Information Request- FOI Decision Letter", Executive Manager, FOI Decision Maker, 6 Jan, 2020, Australian Government Productivity Commission.

² Karyn E Alexander and Danielle Mazza, *Medical Journal of Australia*, Volume 203, Issue 8, 19 October 2015.

³ Table 1. Number of patients who had at least one prescription filled for PBS/RPBS listed antidepressant drug in 2007/08 year by age and State/Territory. Department of Health and Ageing, 2008, <https://cchr.org.au/wp-content/uploads/2016/08/Antidepressants-2007-2008.pdf>; "Table 1. Number of patients who had at least one prescription filled for PBS/RPBS listed antipsychotic drug in 2007/08 year by age and State/Territory. Department of Health and Ageing, 2008, <https://cchr.org.au/wp-content/uploads/2016/08/Antipsychotics-2007-2008.pdf>; "Number of Patients on Attention Deficit Hyperactivity Disorder (ADHD) Drugs," Freedom of Information Request No: 112/0708, Department of Health and Ageing, 2008 <https://cchr.org.au/wp-content/uploads/2017/02/Part-1-of-numbers-on-ADHD-drugs-2007.pdf>; "Report 3A, Number of Unique Patients by Patient Age Group and Patient State for Requested ADHD Items Supplied from 1 January 2015 to 31 December 2015," Request Number- MI5329, Department of Human Services, Strategic Information Division, Information Services Branch, 27 May 2016. <https://cchr.org.au/wp-content/uploads/2016/08/Numbers-on-ADHD-Drugs-30-May-2016.pdf>; "Report 1A, Number of Unique Patients by Patient Age Group and Patient State for Requested Antidepressant Items Supplied from 1 January 2015 to 31 December 2015," Request Number-MI5329, Department of Human Services, Strategic Information Division, Information Services Branch, 27 May 2016. <https://cchr.org.au/wp-content/uploads/2016/08/Numbers-on-Antidepressants-30-May-2016.pdf>; Report 2A, Number of Unique Patients by Patient Age Group and Patient State for Requested Antipsychotics Items Supplied from 1 January 2015 to 31 December 2015," Request Number- MI5329, Department of Human Services, Strategic Information Division, Information Services Branch, 27 May 2016. <https://cchr.org.au/wp-content/uploads/2016/08/Numbers-on-Antipsychotics-30-May-2016.pdf>