5.21 GLYCOMACROPEPTIDE AND ESSENTIAL AMINO ACIDS WITH VITAMINS AND MINERALS, Oral liquid 250 mL, 30, PKU Glytactin RTD 15 Lite®, Cortex Health Pty Ltd

1 Purpose of Application

1.1 The minor submission requested a Restricted Benefit listing of a new form of glycomacropeptide and essential amino acids with vitamins and minerals (PKU Glytactin RTD 15 Lite®) for the treatment of phenylketonuria (PKU).

2 Requested Listing

2.1 The submission requested the following new listing:

2.2 Suggestions by the Secretariat are shown in italics and deletions are shown in strikethrough in the proposed restriction.

Name, Restriction, Manner of administration and form	Max. Qty	№.of Rpts	Dispensed Price for Max. Qty	Proprietary Name and Manufacturer	
GLYCOMACROPEPTIDE AND ESSENTIAL AMINO ACIDS WITH VITAMINS AND MINERAL glycomacropeptide and essential amino acids with vitamins and minerals containing 15 g of protein equivalent oral liquid, 30 × 250 mL cartons	4	5	$1,570.81	PKU Glytactin RTD 15 Lite	Cortex Health Pty Ltd

Category / Program	GENERAL – General Schedule (Code GE)
Prescriber type:	☐Dental ☒Medical Practitioners ☒Nurse practitioners ☐Optometrists ☐Midwives
Condition:	phenylketonuria
PBS Indication:	phenylketonuria
Restriction Level / Method:	☒Restricted benefit
Foreword	This product contains higher vitamin A levels than other PBS-listed glycomacropeptide products ~~and the same level as PKU Glytactin RTD 15~~.

3 Background

3.1 The sponsor of PKU Glytactin RTD 15 Lite® confirmed it meets the requirements for foods for medical purposes as set out under The Australia New Zealand Food Standards Code — Standard 2.9.5: Food for Special Medical Purposes.

3.2 PKU Glytactin RTD 15 Lite® has not been previously considered by the PBAC.

4 Comparator

4.1 The minor submission nominated PKU Glytactin RTD 15® as the main comparator.

For more detail on PBAC's view, see section 7 PBAC outcome.

5 Consideration of the evidence

Sponsor hearing

5.1 There was no hearing for this item as it was a minor submission.

Consumer comments

5.2 The PBAC noted that there was no consumer comment for this submission.

Clinical trials

5.3 The Sponsor provided a summary of clinical trials which were previously presented in the PKU Glytactin RTD submission. As a minor submission, no clinical trials directly related to the PKU Glytactin RTD 15 Lite® were presented in the submission.

Estimated PBS usage & financial implications

5.4 The submission stated that PKU Glytactin RTD 15 Lite is expected to replace actual and future projected use of the comparator PKU Glytactin RTD 15, and was not expected to grow the market.

5.5 The submission stated the listing of PKU Glytactin RTD 15 Lite® is expected to be cost neutral to the PBS as its dispensed price for maximum quantity (DPMQ) is derived based on an equivalent cost per gram of protein equivalent compared with PKU Glytactin RTD 15 at the approved ex-manufacturer price (AEMP) (Table 1).

Table1. Calculation of AEMP and DPMQ of PKU Glytactin RTD 15 Lite® based on cost equivalence to the comparator

Product	PBS Pack	Protein equivalent* (g)	AEMP (per pack)	AEMP per g protein equivalent	Max qty	DPMQ
PKU Glytactin RTD 15 Lite®	250mL carton, 30	15	$360.72	$0.802	4	$1,570.81

* Per sachet. Extract from page 49 of the submission

For more detail on PBAC's view, see section 7 PBAC outcome.

6 NPWP Consideration (and sponsor's response)

6.1 The Nutritional Product Working Party (NPWP) considered there is a clinical place for PKU Glytactin RTD 15 Lite® for PKU patients and a place for low energy alternatives to treat PKU more broadly, as weight management is often a challenge in PKU patients due to protein-restricted diets, meaning patients often meet their energy

requirements with carbohydrates. As part of the evaluation process, the NPWP was generally supportive of the listing of PKU Glytactin RTD 15 Lite®, however requested the sponsor address a number of issues prior to consideration by the PBAC. The sponsor responses to NPWP queries are included below.

6.2 The terms 'pre-biotic' and 'pro-biotic' were used interchangeably throughout the submission. The Sponsor acknowledged this advice, and clarified that PKU Glytactin RTD 15 Lite® does not contain probiotics. The amended submission removed all reference to this ingredient.

6.3 The NPWP further considered the claimed rationale for the reduction of folic acid in the product was of uncertain validity. The Sponsor explained it has been reported that patients with PKU may have high plasma folate levels due to the very high folic acid content in some protein substitutes, plus intake from food sources [1] [2] [3]. The submission compared the folic acid against folate content due to how the US Food and Drug Administration (FDA) view the natural and synthetic forms of vitamin. Based on the current FDA regulations around Nutrition and Supplement Facts labels, the vitamin in both foods and dietary supplements are identified as 'folate' (DFE). Therefore, the Sponsor compared 100 mcg DFE in PKU Glytactin RTD 15 Lite® with the existing formulation (i.e. 238 mcg DFE (140 mcg folic acid)). The Sponsor claimed that patient groups receive a reduced, but sufficient level of dietary folate in new formulation.

6.4 The sponsor has also confirmed that PKU Glytactin RTD 15 Lite® contains no taurine, which is consistent with PKU Sphere®, an alternative GMP formulation.

For more detail on PBAC's view, see section 7 PBAC outcome.

7 PBAC Outcome

7.1 The PBAC recommended the Restricted Benefit listing of a new form of glycomacropeptide and essential amino acids with vitamins and minerals (PKU Glytactin RTD 15 Lite®) on a cost-minimisation basis with the comparator, PKU Glytactin RTD 15®, for the treatment of phenylketonuria (PKU) at an equivalent cost per gram of protein equivalent (PE).

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[1] Stølen LH, Lilje R et al. (2013). High dietary folic acid and high plasma folate in children and adults with phenylketonuria. JIMD Reports DOI 10.1007/8904_2013_260 (available at https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4110334/

[2] Kose E, Aslan N (2018). Vitamin/mineral and micronutrient status in patients with classical phenylketonuria. Clin Nutr epub Feb 9 2018 (Abstract available at https://www.ncbi.nlm.nih.gov/pubmed/29433755)

[3] Montoya Parra, GA, Singh RH et al. (2018). Status of nutrients important in brain function in phenylketonuria: a systematic review and meta-analysis. Orphanet Journal of Rare Diseases oi.org/10.1016/j.clnu.2018.01.034 https://doi.org/10.1186/s13023-018-0839-x (available at: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6020171/)

7.2 The PBAC noted that the Nutritional Product Working Party (NPWP) supported the decision to list PKU Glytactin RTD 15 Lite® on the PBS.

7.3 The PBAC noted that the requested maximum quantity of 4 packs with 5 repeats is consistent with the main comparator, PKU Glytactin RTD 15®.

7.4 The PBAC considered that the Early Supply Rule should not apply as it has been the PBAC's view that general nutrients by exempt.

7.5 The PBAC advised that PKU Glytactin RTD 15 Lite® should be eligible for prescribing by nurse practitioners, similar to other nutritional products currently included for prescribing by nurse practitioners.

7.6 In accordance with Section 101 (3BA) of the National Health Act, the PBAC advised it was of the opinion that, on the basis of the material available to it, PKU Glytactin RTD 15 Lite® should be treated as interchangeable on an individual patient basis with similar nutritional products. Similar products in this case may include the comparator, PKU Glytactin RTD 15®.

7.7 The PBAC advised, under Section 101 (4AACD) of the National Health Act, that the glycomacropeptide formulas PKU Glytactin RTD 15 Lite® and PKU Glytactin RTD 15® should not be considered equivalent for the purposes of substitution (i.e., 'a' flagged in the Schedule with a NOTE stating PBS of one form and PBS of another form are equivalent for the purposes of substitution) as the low energy formulation may serve to better meet the specific energy requirements of some patients.

7.8 The PBAC noted this submission was not eligible for an Independent Review, as it received a positive recommendation.

Outcome:
Recommended

8 Recommended listing

8.1 Add new item:

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GLYCOMACROPEPTIDE AND ESSENTIAL AMINO ACIDS WITH VITAMINS AND MINERAL glycomacropeptide and essential amino acids with vitamins and minerals containing 15 g of protein equivalent oral liquid, 30 × 250 mL cartons	4	5	PKU Glytactin RTD 15 Lite	Cortex Health Pty Ltd

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Condition:	phenylketonuria
PBS Indication:	phenylketonuria
Restriction Level/Method:	☒Restricted benefit
Administrative Advice	This product contains higher vitamin A levels than other PBS-listed glycomacropeptide products ~~and the same level as PKU Glytactin RTD 15~~.

9 Context for Decision

The PBAC helps decide whether and, if so, how medicines should be subsidised in Australia. It considers submissions in this context. A PBAC decision not to recommend listing or not to recommend changing a listing does not represent a final PBAC view about the merits of the medicine. A company can resubmit to the PBAC or seek independent review of the PBAC decision.

10 Sponsor's Comment

The sponsor had no comment.