



australasian society of clinical immunology and allergy inc.

15 June 2014

PBS Post-Market  
Department of Health  
MDP 900  
GPO Box 9848  
Canberra ACT 2601  
[PBSpostmarket@health.gov.au](mailto:PBSpostmarket@health.gov.au)

Dear Ms Robinson,

**RE: Post Market Review of Authority Required Pharmaceutical Benefits Scheme (PBS) listings**

Thank you for the opportunity to comment on the issues surrounding authority prescriptions for adrenaline auto injectors, specifically whether it is appropriate for initial prescriptions for adrenaline autoinjectors to continue to be on authority prescription, and subject to specialist consultation (either in person or by other forms of communication).

At this time, there has been no audit of a non-specialist's ability to prescribe adrenaline auto injectors appropriately according to PBAC guidelines, or even the proportion of adrenaline auto injectors that are prescribed using a specialist's name, where such communication has not occurred and where the patient has never seen an allergy/immunology specialist.

Given the potential impact on inappropriate diagnosis without specialist review, and long-term impact on health costs from ongoing inappropriate supply, we believe it is appropriate for an initial prescription to still require specialist consultation before initiation. By contrast, we think it is appropriate that ongoing prescriptions could be streamlined once an initial prescription has had specialist authorisation.

Ideally, streamlining for ongoing supply would have a time limit (for example of five years) so that this would prompt specialist review and facilitate appropriate dose adjustment for paediatric patients, and the need or otherwise for ongoing supply, but we acknowledge that this might introduce complexities that are not possible to solve within the current authority prescription system.

Yours sincerely,

A handwritten signature in black ink, appearing to read "R Mullins".

Dr Raymond Mullins  
Chair  
ASCIA Anaphylaxis Committee

ASCIA is the peak professional body of clinical immunology and allergy specialists in Australia and New Zealand.  
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