



australasian society of clinical immunology and allergy

27 April 2020

Professor Andrew Wilson  
Chair, Pharmaceutical Benefits Advisory Committee (PBAC)  
MDP 952, GPO Box 9848  
Canberra, ACT 2601  
Email: [pbac@health.gov.au](mailto:pbac@health.gov.au)

Dear Professor Wilson,

**Re: Concerns about revised PBS listings for antibiotics and patients with immunodeficiencies**

We write on behalf of the Australasian Society of Clinical Immunology and Allergy (ASCIA) regarding concerns about the Pharmaceutical Benefits Scheme (PBS) listings for antibiotics, that commenced on 1st April 2020, and patients with immunodeficiencies.

ASCIA was not consulted by the PBAC regarding this recommendation, to amend the maximum quantity and repeats for the top five most commonly prescribed PBS listed antibiotic medications: amoxicillin, amoxicillin with clavulanic acid, cefalexin, doxycycline and roxithromycin.

We understand and support the basis of these changes, that are intended to encourage clinicians to prescribe antibiotic repeats only when clinically indicated, thus reducing inappropriate prescribing and increasing quality use of antibiotic medicines.

However, ASCIA members (clinical immunology/allergy specialists) manage immunosuppressed patients, mainly due to inherited primary immunodeficiencies, and many of these patients rely on access to long term antibiotics for prophylaxis, to reduce infections and hospitalisations. Patients with primary immunodeficiency also often require longer courses of antibiotic therapy to clear infections.

In 2020 it is more important than ever that these vulnerable patients have access to long term antibiotics, to avoid multiple repeat visits to doctors for prescriptions, as this could expose them to respiratory infections, including the coronavirus that causes COVID-19.

Therefore, we request that the PBAC allows patients with immunodeficiencies to be exempt from the new PBS restrictions, so that they can be prescribed three to six months supply of antibiotics, for long courses of treatment, or for prophylaxis. This would be more in keeping with the usual prescribing practices for patients with immunodeficiencies, until the change on 1st April 2020.

We hope that our request is given due consideration and look forward to your response.

Yours sincerely,

Dr Brynn Wainstein  
ASCIA President

Dr Theresa Cole  
Chair, ASCIA Immunodeficiency committee  
Chair, ASCIA COVID-19 working party