

28 July 2025

Dear Minister Butler,

Re: Support for PBS Listing of Amino Acid Formula (AAF) for Patients with Cow's Milk Allergy, Multiple Food Allergies and Eosinophilic Oesophagitis (EoE)

Allergy & Anaphylaxis Australia (A&AA) is a charitable, non-profit organisation established in 1993 to support those affected by allergic disease, including risk of anaphylaxis. A&AA is dedicated to assisting individuals, their caregivers and all in the community in the management of allergic conditions, including food allergy. A&AA's aim is to enable individuals and their families to enjoy an optimal quality of life whilst minimising risk to their health and wellbeing.

A&AA has a Medical Advisory Board that consists of several allergy specialists who are also members of Australia's peak medical body, ASCIA (the Australasian Society of Clinical Immunology and Allergy). We have subscribers across all states and territories of Australia. Through our National Allergy Helpline and email correspondence, along with our social media platforms, A&AA connects with and advocates on behalf of Australians living with allergies, including many families managing cow's milk allergy.

Complete avoidance of cow's milk is the only treatment for cow's milk allergy. Infants with cow's milk allergy who are unable to breast feed or who need supplementary infant formula require a cow's milk free formula. Individuals with cow's milk allergy are strongly advised to avoid all mammalian milks. Amino acid formula (AAF) is well established as the best choice of formula for infants at risk of anaphylaxis to cow's milk, or infants who are symptomatic with formulae based on soy protein or extensively hydrolysed milk protein. For cow's milk enteropathy (known as non-IgE mediated food allergy), amino acid formula is required where the infant's growth is faltering or when they are unable to tolerate hydrolysed or soy formula.

In Eosinophilic Oesophagitis (EoE), an amino acid formula is often required for infants and children during trial or maintenance of dietary elimination therapy.

Supplementation with an appropriate amino acid-based formula facilitates resolution of symptoms and promotes normal growth, development and acquisition of normal feeding skills in infants and children with cow's milk allergy, cow's milk enteropathy and EoE.

We understand that Nutricia has recently applied for a Pharmaceutical Benefits Scheme (PBS) Ministerial discretion, to apply discretion to the price reductions taking place to Neocate® Gold and Neocate® Junior.



**Allergy & Anaphylaxis
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A&AA strongly supports the discretion to be applied to these products, so they remain accessible through the Pharmaceutical Benefits Scheme (PBS). In particular, we advocate for:

- ***Maintaining PBS access to Neocate® Gold and Neocate® Junior for infants and children with cow's milk allergy, cow's milk enteropathy and EoE. Many families managing food allergy already have significantly increased costs to bear due to expenses related to medical and allied health consultations, medication and specialised foods.***
- ***Ensuring a variety of AAF options are available in the market to:***
 - a) meet the diverse nutritional and sensory needs of patients across age groups.***
 - b) avoid a situation where there is no accessible option for infants and children where Neocate® Gold or Neocate® Junior is the sole source of nutrition. In recent years there have been supply issues and shortages with all brands of AAF.***

Without PBS access, many individuals and families would face significant financial barriers to treatment which would very likely impact infant and child growth, nutrition and development.

If you require further information or would like to discuss this matter, please don't hesitate to contact us.

Yours sincerely,

Maria Said AM
Chief Executive Officer
Allergy & Anaphylaxis Australia