
Pharmaceutical Benefits Advisory Committee (PBAC)

28th May 2024

Dear PBAC,

Allergy & Anaphylaxis Australia (A&AA), the Australasian Society of Clinical Immunology and Allergy (ASCIA) and the National Allergy Council welcome the opportunity to lodge our comments regarding the submission for a new PBS listing for Jext® Jnr and Jext® which is on the July 2024 Pharmaceutical Benefits Advisory Committee (PBAC) meeting agenda.

Jext® Jnr (contains 150 micrograms adrenaline) and Jext® (contains 300 micrograms adrenaline) are single dose syringe autoinjectors. The submission requests a General Schedule Authority Required (Telephone/Online) listing of a new form for the treatment of acute allergic reaction with anaphylaxis.

Background

A&AA is a registered charity, established in 1993, to inform and support those affected by allergy and anaphylaxis. A&AA is dedicated to assisting individuals, their caregivers and all in the community in the management of allergic conditions. 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 is part of an international alliance of like-minded organisations and works closely with peak medical bodies including ASCIA, the peak professional body for clinical immunology and allergy in Australia and New Zealand.

The National Allergy Council is a partnership between ASCIA and A&AA. The National Allergy Council receives funding from the Australian Government Department of Health to implement the National Allergy Strategy.

Submission

A&AA, ASCIA and the National Allergy Council believe Australian prescribers and patients should have the ability to choose an adrenaline injector device that best suits their needs. Different brands of adrenaline devices have different modes of administration. Anaphylaxis is a life-threatening emergency and adrenaline must be administered immediately, which is why it is essential that patients are prescribed the adrenaline device they are most comfortable using. The addition of Jext® Jnr and Jext® to the Australian market will increase the options available to Australian patients.

Currently in Australia there are two brands of adrenaline devices available - EpiPen® and Anapen®. EpiPen®, like Jext®, is available in two strengths – 150 and 300 micrograms. Anapen® is available in three strengths 150, 300 and 500 micrograms with the 500mcg dose being for those 50kg and over.

There are advantages to having more than one brand of adrenaline device on the market in Australia. These include:

- a reduced risk of supply shortage.
- the ability for patients to have a device that they feel most comfortable administering.
- in the case of Anapen®, they offer a 500 microgram dose which is beneficial for those who require multiple doses of adrenaline or who weigh more than 50kg.

A&AA, ASCIA and the National Allergy Council believe that it is important that any new adrenaline device has a point of difference (such as a different dose or different mode of administration) to encourage prescription by health care professionals and uptake by the community. Favourable points of difference may encourage health professionals and those at risk of anaphylaxis to consider prescription of alternate devices when there is reluctance because of differences in steps to administer the various brands of adrenaline devices.

Whilst it is important that people with allergy can choose an adrenaline device that suits them best, we must be aware of the challenges that come with the introduction of a new device with a different mode of administration. Doctors and patients will need education about how to administer the new device. ASCIA Action Plans for Anaphylaxis which accompany each adrenaline device prescription will require updating, as will ASCIA anaphylaxis e-training courses and many other ASCIA, A&AA and National Allergy Council resources. The sponsor of Jext® must be aware of the time required to update these resources and the substantial additional costs for ASCIA, A&AA and the National Allergy Council.

A&AA, ASCIA and the National Allergy Council believe it is important for patients and clinicians alike to have choice so they can be prescribed an adrenaline device that best suits their needs.

We appreciate the opportunity to provide input.

Yours sincerely,

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