

23 March 2016

Mr Greg O'Toole
The Secretary
PBAC
GPO Box 9848
Canberra ACT 2601
Via email: pbac@health.gov.au

Dear Mr O'Toole,

Thank you for your correspondence of 11 February 2016 regarding the Pharmaceutical Benefits Advisory Committee (PBAC) proposed changes to the PBS listing of alprazolam.

The RACGP supports the proposed changes of:

- Removing the 2mg strength of alprazolam from the PBS; and
- Reducing the pack size from 50 tablets to 10 for the remaining strengths, with nil repeats.

As stated in our submission to PBAC in October, although data is not currently available on how pack sizes and tablet dosages may contribute to inappropriate use, the current size of packs enable large quantities to be purchased and a 2mg tablet is mostly an excessive dose. Once implemented, we recommend a review of the impact of these changes should be undertaken.

Additionally, we would like to further iterate our recommendation that the current PBS specification for prescribing alprazolam should be revised so it is clearer that it should be prescribed after a clear diagnosis of panic disorder has been made and not to patients with comorbid alcohol or substance use disorders or polydrug use.

The RACGP thanks PBAC again for the opportunity to contribute to this important discussion.

Yours sincerely

Dr Frank R Jones

President