MULTIPLE SCLEROSIS AUSTRALIA

Submission to the TGA consultation: referral of proposed amendments to the current Poisons Standard to the ACMS, Joint ACCS-ACMS or ACCS meeting, November 2018, regarding Nabiximols.

25 September 2018

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Multiple Sclerosis Australia

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Medicine: Nabiximols [redacted]

Purpose of submission

MS Australia is writing to support the down-scheduling of nabiximols from Schedule 8 to Schedule 4 and deleting the Appendix D, item 1 entry for nabiximols, from the Poisons Standard, as set out in the details of proposed amendments to the current Poisons Standard to the ACMS, Joint ACCS-ACMS or ACCS meeting, November 2018.

The impact of multiple sclerosis

As the national peak body for people with MS we are proud to advocate on behalf of our member organisations and the MS community. One area we are particularly passionate about is the provision of more affordable and accessible treatments that can improve the lives of people with MS.

There are currently more than 25,000[1] people living with MS across the country. MS can be a particularly debilitating disease with an unpredictable disease course. No two cases of MS are the same. There is no one-size fits all treatment for people living with MS and to date, there is no known single cure.

The challenges faced by people with MS can be significant and can have a devastating impact on their families and the wider community. Relapses can result in short term or long term disability, resulting in the need for physical and/or psychological care and support, medical investigations, treatments and hospitalisation.

The symptoms of MS (such as fatigue, spasticity and neuropathic pain), and/or the gradual progression of the disease through relapses, mean that the majority of people with MS are unable to retain their employment. In fact, people with MS are more likely to be unemployed than those with any other chronic disease. This contributes to an increasing economic burden of MS on the rest of society. The economic cost of MS to the Australian community has been estimated to be around $1.75 billion a year[2].

Support for down-scheduling of nabiximols

Being able to better manage and limit the impact of the symptoms associated with MS can help alleviate the burden of MS on the community and the individual.

We understand that by down-scheduling nabiximols and deleting Appendix D, that prescribing, storing, transporting and distributing nabiximols will be easier, resulting in potential cost savings for consumers.

Nabiximols is not currently listed on the PBS and we understand that it is currently priced at around $745 for a 6-8 week supply, so any potential cost savings will make an enormous difference to consumers.

There is considerable interest in this medication from the MS community. The introduction of this product as an easy-to-use mouth spray, has clearly promoted patient satisfaction and increases therapeutic compliance. Easy-to-use medications for MS are also of great benefit for people living with MS in rural and regional settings where the need for hospital and clinic visits can be minimised or not needed at all.

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[1] The Health Economic Impact of Multiple Sclerosis in Australia 2017 report, commissioned by MS Research Australia and prepared by the Menzies Institute for Medical Research, University of Tasmania, August 2018

[2] ibid

This medication has made a valuable addition to the repertoire of medications available to people with MS and their healthcare teams. It allows for an appropriate treatment choice to be made according to the efficacy and possible side-effects in relation to an individual's circumstances and, with these further amendments to scheduling, has the potential to help alleviate the economic cost of MS to individuals, their families and the broader community.

Declaration of interest:

MS Australia is making this submission as we have an interest in the health and well-being of all people with MS. MS Australia is the national peak body for people living with MS in Australia. We work with governments at all levels, engaging on the issues that concern the lives of people living with MS, their families and carers, the community and the economy. We declare that we have not received funding support from the sponsors of this medicine, [redacted].

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