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February 18th, 2010

The Secretary
Senate Community Affairs Committee

Dear Sir/Madam,

I write in relation to the recent PBAC recommendation to treat bisphosphonates, including alendronate and risedronate alone and in combinations with calcium and/or vitamin D, as “interchangeable on an individual patient basis”.

I am concerned that this decision has been taken without any consultation with therapeutic groups including individuals working in this area.

There are clinically significant differences in these agents in terms of their speed of onset and persistence of effect at offset. There are areas where there are distinctly different levels of evidence on efficacy, e.g. corticosteroid osteoporosis treatment, between the different agents. Moreover there are differences that may relate to compliance as to whether they can be administered weekly, monthly or annually.

I respectfully request that further careful consideration should be given to continuing differentiation of these agents to avoid patients suffering financial or therapeutic penalty.

One of the great strengths of the TGA and PBAC systems has been the intense scrutiny that is given to evidence related to new drugs and indeed the specificity of approvals, based on sound scientific evidence. I am concerned that this scientific focus, an internationally recognised strength of the Australian system, is potentially being discarded.

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C.c: Senators Siewert, Moore, Fielding, Xenophon, Fierravanti-Wells, Hon P Dutton, Ms Cross