



3 June 2019

State Development, Natural Resources and Agricultural Industry Development Committee
Parliament House
George Street, Brisbane Qld 4000
Email: sdnraidc@parliament.qld.gov.au

Dear Secretary,

Re: Patient delivered partner therapy for uncomplicated genital chlamydia infection

We are writing to seek clarification regarding the position of the Medicines and Poisons Bill 2019 in respect to Patient Delivered Partner Therapy (PDPT) for genital chlamydia infection. Australian clinical guidelines recommend that sexual partners of those diagnosed with genital chlamydia infection should be treated to minimise ongoing transmission and the risk of developing reproductive complications associated with infection. The standard treatment is 1 gram of azithromycin. PDPT is when the person diagnosed with chlamydia is provided with a prescription for azithromycin to pass onto their sexual partners. Our submission relates to:

- Chapter 2, Part 2, Division 3, Subdivision 3, 33 Content of prescriptions other than medication chart prescriptions: that specifies the information that must be included on the prescription for the supply of medicine including the prescriber's qualifications and contact details, details of the medication being prescribed, and, if the medicine is for a patient—the patient's contact details.
- Chapter 2, Part 2, Division 5, 58, Records of dispensed medicines: that specifies the information a dispenser must keep in a record after dispensing a medicine to a patient including:
 - the name of the dispenser and the prescriber;
 - the name and address of the patient;
 - details of the medicine dispensed (name, form, strength and amount dispensed);
 - date of the prescription; and
 - a unique identifier given to the prescription for the medicine by the dispenser.

We wish to clarify whether the provision of an additional azithromycin prescription for a patient diagnosed with uncomplicated genital chlamydia infection to give to their sexual partner(s) without the partner(s) consulting a doctor is allowable under the Act. If this is not allowable, we strongly advocate on the basis of public health need, for amendment to the Act or Regulations to allow for prescription of azithromycin in the manner as described.

PDPT has been shown to be effective in treating partners who may not have otherwise accessed treatment, thereby preventing re-infections and treating more partners per index patient than patient-initiated notification.ⁱ Prevention of reinfection is a priority, because chlamydia reinfection increases the risk of complications. For women, reinfection poses a four-fold higher risk of her developing pelvic inflammatory disease that can lead to infertility.^{ii iii} The provision of PDPT for the sexual partner(s) of a patient with genital

chlamydia infection can be viewed as falling within a health professional's duty of care to their patient by reducing their patient's risk of a reinfection.

In Australia, PDPT for uncomplicated genital chlamydia infection is not uniformly available. Some jurisdictions have undertaken regulatory change or provided clinical guidance.

- In the Northern Territory, Section 89 of the *Medicines, Poisons and Therapeutic Goods Act*^{iv} provides the legal basis for PDPT, stating it is for the medical condition of chlamydia and Regulation 12^v provides the basis for prescribing including that the patient (index case) must have been diagnosed with chlamydia, the sexual partner is at risk of contracting chlamydia and the prescription is only for Azithromycin.
- In Victoria, the Victorian Department of Health and Human Services provided guidance for PDPT for chlamydia via a Clinical Guideline^{vi}. This Clinical Guideline includes an explanation of how use of PDPT in accordance with the Clinical Guideline would satisfy the requirements of the Drugs, Poisons and Controlled Substances Regulations 2006 - regulation 8(2) and regulation 9(2).^{vii}
- In New South Wales, the Poisons and Therapeutic Goods Regulation 2008^{viii} (amended 2017^{ix}) provide the legal basis for PDPT. Part 3, Division 3, Clause 35 states that a prescription for a restricted substance must include the issuing date, the treatment it is for, and the name and address of the patient. Clause 35 also specifies that where the treatment is for a patient's partner and the prescription is for azithromycin for the treatment of chlamydia—that the name and email address or mobile phone number of the partner can be recorded in lieu of the full address.

Thank you for your consideration of this important issue.

Sincerely,



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ⁱ Althaus CL, et al. *Effectiveness and cost-effectiveness of traditional & new partner notification technologies for curable STIs*. Health Technology Assessment 2014. **18**(2) p. 1-100, vii-viii.

ⁱⁱ Davies B., et al. *Heterogeneity in risk of PID after chlamydia infection: a population-based study in Manitoba, Canada*. J Infectious Disease, 2014. **210**(Suppl 2):S549-55. Doi 10.1093/infdis/jiu483

ⁱⁱⁱ Price MJ, et al. *The natural history of Chlamydia trachomatis infection in women: a multiparameter evidence synthesis*. Health Technology Assessment 2016. **20**(22):1-250.

^{iv} Northern Territory of Australia (2014). MEDICINES, POISONS AND THERAPEUTIC GOODS ACT 2012. <https://legislation.nt.gov.au/en/legislation/medicines-poisons-and-therapeutic-goods-act-2012> Accessed 3rd Jun 2019

^v Northern Territory of Australia (2014). Medicines, Poisons and Therapeutic Goods Regulations 2014. Dept of Health. <https://legislation.nt.gov.au/en/Legislation/medicines-poisons-and-therapeutic-goods-regulations-2014> Accessed 3rd June 2019

^{vi} Department of Health and Human Services. Patient delivered partner therapy clinical guidelines. State Gov of Victoria; 2015. <https://www2.health.vic.gov.au/about/publications/policiesandguidelines/pdpt-clinical-guidelines> Accessed 3rd June 2019.

^{vii} Victorian Government. Drugs, Poisons and Controlled Substances Regulations 2006 S.R. No. 57/2006 [http://www.legislation.vic.gov.au/domino/Web_Notes/LDMS/LTOBJect_Store/LTOBJSt6.nsf/DDE300B846EED9C7CA257616000A3571/CBB80677A53FB2B4CA2578B1000601ED/\\$FILE/06-57sra010%20authorised.pdf](http://www.legislation.vic.gov.au/domino/Web_Notes/LDMS/LTOBJect_Store/LTOBJSt6.nsf/DDE300B846EED9C7CA257616000A3571/CBB80677A53FB2B4CA2578B1000601ED/$FILE/06-57sra010%20authorised.pdf) Accessed 3rd June 2019.

^{viii} New South Wales Government (2019). Poisons and Therapeutic Goods Regulation 2008. <https://www.legislation.nsw.gov.au/#/view/regulation/2008/392/full> Accessed 3rd June 2019.

^{ix} New South Wales Government (2017). Health Practitioner Regulation (New South Wales) Amendment (Records of Partners) Regulation 2017. Published LW 8 Dec 2017 (2017 No 687) <https://www.legislation.nsw.gov.au/regulations/2017-687.pdf> Accessed 3rd June 2019.