

11 February 2025

The Hon Ged Kearney MP
Assistant Minister for Health and Aged Care, Assistant Minister for
Indigenous Health

By email: [REDACTED]

Subject: Expanded Prescriber Bag

Dear Assistant Minister

AMA Queensland has been advocating for expansion of the medicines available in the PBS-funded Prescriber Bag to improve access for patients in urgent, emergency and other essential circumstances. Expansion will ensure timely access to healthcare, particularly for patients in regional, rural and remote areas with limited afterhours pharmacies, and reduce avoidable hospital presentations and admissions.

Queensland Health have indicated support for expansion under relevant Queensland legislation but noted it would not achieve its policy intent if the Australian Government did not ensure requisite inclusion of the expanded list on the PBS (refer enclosed).

We wholeheartedly support the advocacy of our AMA and AMA Victoria colleagues, in urging PBAC to include the medicines set out in the enclosed correspondence from our respective organisations. This is particularly crucial for common antibiotics and reproductive health care medicines, including MS-2 Step, to increase women's access to essential treatment – especially those without access to safe and appropriate termination services.

We encourage you to consider expanding the Prescriber Bag and offer to meet with you and/or relevant Department representatives to discuss further as desired.

Yours sincerely

[REDACTED]

Dr Nick Yim
President
AMA Queensland

Dr Brett Dale
Chief Executive Officer
AMA Queensland

Enclosed:

Letter dated 10 September 2024 from AMA Queensland to Queensland Health Chief Medical Officer

Letter dated 11 November 2024 from Queensland Health Chief Medical Officer to AMA Queensland

Letter dated 10 December 2024 from AMA to Minister Butler

Letter dated 28 January 2025 from AMA Victoria to PBS Post-Market Reviews Section

10 September 2024

Assoc Prof Catherine McDougall
Chief Medical Officer
Queensland Health

By email: [REDACTED]

Subject: Expansion of doctors' bags

Dear Catherine

As previously discussed, AMA Queensland is committed to supporting initiatives that increase patient access to health services, including medicines. We note early access to medicines ensures commencement of treatment and continuity of care, improving health outcomes.

Members have raised with us that expanding the range of medicines currently available via doctors' bags would greatly increase access for patients, particularly those in regional, rural and remote services, after hours when pharmacies are often closed and during emergencies. Our Committee of General Practice has suggested medicines for the Department's consideration, set out in the enclosure.

We understand Queensland Health would need to examine the associated legislative requirements to enable the scope of practice expansion, including amendment of the *Medicines and Poisons (Medicines) Regulation 2021* and possible requisite Commonwealth changes to the current National Health (Prescriber Bag Supplies) Determination 2024. We offer our assistance in progressing reform on this issue for the benefit of all Queensland patients.

Yours sincerely

[REDACTED]

Dr Nick Yim

President
AMA Queensland

Dr Brett Dale

Chief Executive Officer
AMA Queensland

Enclosure: Expanded doctors' bags medicines

- Antibiotics (including syrups)
 - Amoxicillin
 - Cefalexin
 - Trimethoprim
 - Doxycycline
 - Azithromycin
 - Ceftriaxone
 - Mupirocin
- Antivirals
 - Valacyclovir
 - Post-exposure prophylaxis (PEP)
- Anti-nausea
 - Ondansetron
- Routine steroids
 - Inhaled corticosteroids
 - Prednisone (including syrup)
- Ear and eye drops
 - Framycetin sulfate 0.5% + gramicidin 0.005% + dexamethasone 0.05% ear drops (Sofradex)
 - Chloramphenicol eye drops
- Cardiovascular
 - Amlodipine
 - Perindopril
- Analgesia
 - Paracetamol
 - Ibuprofen
- Smoking cessation
 - Nicotine replacement therapies
- Gynaecology
 - Mifepristone and misoprostol (MS-2 Step)
 - Oral contraceptive pill – 1 month supply
 - Levonorgestrel emergency contraception



Enquiries to: Dr Catherine McDougall
Chief Medical Officer
Clinical Excellence Queensland
Telephone: [REDACTED]
Our ref: C-ECTF-24/19186

Queensland Health

Mr Nick Yim, President, and Dr Brett Dale, Chief Executive Officer
Australian Medical Association, Queensland
88 L'Estrange Terrace
Kelvin Grove Qld 4059

Email: amaq@amaq.com.au

Dear Dr Yim and Dr Dale,

Thank you for your letter dated 10 September 2024, regarding expansion of the available contents of doctors' bags.

Having reviewed your letter and discussed this matter with you, it is clear to me that AMAQ is seeking to find solutions to ongoing challenges in relation to timely access to healthcare, including medicines. Queensland Health supports this goal.

As discussed over the phone, there is no regulatory obstacle to expanding the contents of the doctors' bag within the *Medicines and Poisons Act 2019* and this is the regulatory lever that exists within the Queensland Government. The issue would be Pharmaceutical Benefits Scheme (PBS) subsidy for the medicines and the responsibility for this lies with the federal government. Therefore, any decisions relating to this are outside the remit of Queensland Health

Nevertheless, I am happy to continue engaging with you in relation to these matters, and seek to understand the role my office, and Queensland Health more broadly, can play in advocating for the best interests of the Queensland community, via the appropriate mechanisms.

Should you require further information, you can contact me via email:

[REDACTED]

Yours sincerely

DR CATHERINE MCDUGALL BPhy, MBBS, FRACS (Orth), GAICD
Chief Medical Officer
Clinical Excellence Queensland
11 / 11 / 2024

10 December 2024

The Hon Mark Butler MP
House of Representatives
Parliament House
Canberra ACT 2600

Dear Minister,

Expanding the Doctor's Bag to improve emergency medicines access

I am writing to seek that you request the Pharmaceutical Benefits Advisory Committee (PBAC) to undertake a review of PBS funded medicines available in the Prescriber Bag (Doctor's Bag).

The Doctor's Bag is intended to ensure patients have access to medicines in urgent and emergency situations. It has not been subject to a comprehensive review for several years. Making more medicines available through an updated Doctor's Bag would improve access to care for patients, particularly those in regional, rural and remote services, during the after-hours period, and in emergencies.

While additions to the Doctor's Bag have been made in recent years, this has been done on an ad hoc basis. We are requesting a full review of the current list of eligible medicines and advocating for the inclusion of additional medications to ensure it remains fit for purpose. There are a range of conditions and emergency scenarios where appropriate medications are not currently included, for example common antibiotics, and MS-2 Step for patients who have no other access to safe and appropriate pregnancy termination services.

Attached is a list of potential medicines for inclusion developed in collaboration with our state and territory AMA GP colleagues, acknowledging that a full review represents an opportunity for key stakeholders to provide PBAC with advice on a range of potential inclusions.

Expanding the Doctor's Bag aligns with your government's stated policy aim to improve access to urgent care through general practice. It also aligns with the aims of Australia's National Medicines Policy, ensuring "Equitable, timely, safe and affordable access to a high-quality and reliable supply of medicines and medicines-related

services for all Australians.”

The Doctor’s Bag is an invaluable resource for GPs in caring for patients and its potential role in improving access to care and patient outcomes has largely been overlooked as a policy tool. Expanding its contents would be a practical approach to deliver immediate benefits for patients in a safe and cost-effective way and the PBAC is well positioned to make recommendations supporting good clinical practice in the same way as it did with 60-day dispensing.

Yours sincerely



Dr Danielle McMullen
President

CC: Mr Blair Comley, Secretary Department of Health and Aged Care

Attachment: Suggested medicines for inclusion in the Doctor's Bag

- Antibiotics (including syrups)
 - Amoxicillin
 - Cefalexin
 - Trimethoprim
 - Doxycycline
 - Azithromycin
 - Ceftriaxone
 - Mupirocin
- Antivirals
 - Valacyclovir
 - Post-exposure prophylaxis (PEP)
- Anti-nausea
 - Ondansetron
- Routine steroids
 - Inhaled corticosteroids
 - Prednisone (including syrup)
- Ear and eye drops
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 - Chloramphenicol eye drops
- Cardiovascular
 - Amlodipine
 - Perindopril
- Analgesia
 - Paracetamol
 - Ibuprofen
- Smoking cessation
 - Nicotine replacement therapies
- Gynaecology
 - Mifepristone and misoprostol (MS-2 Step)
 - Oral contraceptive pill – 1 month supply
 - Levonorgestrel emergency contraception



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28 January 2025

PBS Post-market Reviews Section
Genomic and Health Technology Assessment Policy Branch
Technology Assessment and Access Division | Health Resourcing Group
Australian Government Department of Health and Aged Care

Via email: [REDACTED]

Dear PBS Post-Market Review team,

Re: Inclusion of Emergency Contraception and MS-2 Step in the PBS Prescriber Bag

I am writing to express my strong support for the inclusion of emergency contraception and MS-2 Step (mifepristone and misoprostol) in the PBS Prescriber Bag. This measure would significantly improve access to essential medications for emergency reproductive healthcare and contribute to reducing preventable hospital presentations and admissions across Australia.

Addressing Access Disparities

Timely access to emergency contraception and medical termination of pregnancy is critical to ensuring effective reproductive healthcare. However, access remains uneven across Australia, with significant postcode-based inequities.

The 2024 report [*Realising access: Abortion and contraception inequities and enablers in Victoria*](#) by Women's Health Victoria (WHV) highlights that, as of December 2023, 39% of Local Government Areas (LGAs) in Victoria had no medication abortion-dispensing pharmacies. Among 24 high-disadvantage rural and regional LGAs, 60% lacked a registered pharmacy for medication abortion. Furthermore, only 19% of pharmacists in Victoria were dispensing these medications by mid-2023.

These geographic inequities disproportionately affect women in rural and regional areas who require emergency contraception or medical termination of pregnancy. These women often face compounded barriers, including financial insecurity, mental illness, family violence, complex medical needs, and caring responsibilities. The 2023 Senate Standing Committee on Community Affairs report [*Ending the postcode lottery: Addressing barriers to sexual, maternity and reproductive healthcare in Australia*](#) reinforces this by identifying that disadvantaged groups, including rural communities, Aboriginal and Torres Strait Islander people, and culturally and linguistically diverse populations, are among the worst affected by these gaps in care.

Including emergency contraception and MS-2 Step in the Prescriber Bag would directly address these inequities. Prescribers in underserved areas would have the ability to dispense these critical medications immediately, overcoming barriers posed by pharmacy stock shortages and logistical challenges.

Reducing Preventable Hospital Presentations and Easing Healthcare System Strain

Delays in accessing emergency contraception or MS-2 Step often escalate into preventable hospital presentations and admissions. For instance:

- Delayed access to emergency contraception increases the risk of unwanted pregnancies.
- Untreated cases requiring medical termination can progress to more complex and resource-intensive care needs, which unnecessarily strain hospital emergency departments.

By enabling prescribers to directly dispense these medications, we can reduce these avoidable hospital presentations, freeing up critical emergency department resources while improving health outcomes for women.

Addressing Gender Inequities in Healthcare Access

The limited distribution of MS-2 Step in pharmacies also perpetuates systemic gender bias in healthcare access. Some pharmacies opt not to stock these medications due to stigma or logistical challenges, leaving women without timely and equitable access to critical care.

By ensuring MS-2 Step is included in the Prescriber Bag, we can begin to dismantle these barriers and provide women with equitable access to reproductive healthcare, irrespective of their geographic location or local pharmacy availability.

Conclusion

The inclusion of emergency contraception and MS-2 Step in the Prescriber Bag is a practical, equitable, and essential step toward improving reproductive healthcare access in Australia. It directly addresses the inequities highlighted in WHV's report, reduces preventable hospital admissions, and promotes public health by ensuring timely interventions.

This initiative aligns with the Department of Health and Aged Care's commitment to reducing avoidable hospital admissions, improving health outcomes, and addressing systemic inequities in healthcare.

Thank you for your attention to this critical matter. I would welcome the opportunity to provide further information or discuss this proposal in more detail.

Yours Sincerely,

A large black rectangular box redacting the signature of Dr. Jill Tomlinson.

Dr Jill Tomlinson
AMA VICTORIA PRESIDENT