



PASH.tm Submission

SUPPORT OF APPLICATION FOR PBS LISTING OF TRUVADA AS PREP

Overview

PASH.tm, the Peer Advocacy network for the Sexual Health of trans masculinities, believes that trans men and trans masculine people (assigned female at birth) who have sex with men; are gay; bisexual; or queer (known collectively as trans MSM) should have access to HIV Pre-Exposure Prophylaxis (PrEP).

The broad definition of 'men who have sex with men' (MSM) does and should always include trans MSM.

Why?

In all of the studies into PrEP, one thing is clear, and that is if taken daily it works.

PASH.tm believes that the risk of acquiring HIV for trans MSM is similar to that of all other men who have sex with men, as they share possible transmission routes in addition to receptive front hole (vaginal) intercourse (for those men who retain natal genitals). This is particularly the case for trans MSM at higher risk of acquiring HIV such as those not wishing to or those unable to use condoms consistently. The genital impact of testosterone treatment (atrophy, and internal wall thinning and tearing) on the relative risk of HIV transmission is clinically unknown. PASH.tm advocates for clinical research in this currently un-researched area.

PrEP subsidised on the PBS means more at-risk trans people, particularly trans MSM, who may be currently importing Truvada for PrEP without regular sexual health screening, will be able to engage with their GP for not only general and transition related healthcare but also sexual healthcare. This would also ensure early detection and treatment of STIs.

Trans MSM and PrEP

PASH.tm recommends a regimen of one tablet per day for at least 20 days to ensure peak and full protection level is reached for receptive front hole sex. Truvada as PrEP reaches protective levels after 7 days of one tablet per day for receptive anal sex.

Accurate inclusion of trans MSM in all PrEP research is of urgent and critical importance. While more research is required, the available evidence confirms that trans MSM are as likely to engage in high risk, condomless receptive intercourse with other gay men and MSM.

Therefore, it is of critical importance that clinical guidelines (including for accessing PrEP) accurately reflect sexual risk, not only with anal sex among all MSM (including trans men) but also receptive front hole sex among trans MSM.

PrEP and the PBS

PrEP has the potential to enable us to dramatically reduce HIV transmission in Australia. It is a critical component of combination HIV prevention efforts for all people at risk of acquiring HIV, including all at risk transgender people such as trans MSM, and trans women and non-binary people who have sex with at risk cisgender (non-trans) men.

Australia's gay and at-risk queer and trans communities have high levels of PrEP awareness and good health literacy. PASH.tm has been contributing to this space with targeted PrEP health promotion messaging, position statements to inform and influence research, policy and service delivery, and international, national and state and territory advocacy in the HIV and gay men's health space for more meaningful trans MSM and broader transgender inclusion. PASH.tm is also in the final stages of development of a sexual health campaign for trans MSM and their cisgender male sexual partners.

PASH.tm's view is that no restrictions should be placed on which doctors are able to prescribe PrEP. Limiting who can prescribe PrEP, such as only to trained and accredited section 100 HIV prescribers, will greatly restrict access and produce inequity across Australia due to the small numbers of s100 doctors in many places. Research shows that MSM (including trans MSM) populations do live in regional, rural and remote locations, while s100 doctor coverage is not concordant with this, revealing further potential inequity in access.

PASH.tm believes that the clinical criteria for prescribing PrEP should include all people who intend or are likely to have receptive condomless sex with casual partners, or with HIV-positive partners with detectable HIV viral load.

Thank you for the opportunity to make a submission in support of Gilead's application for PBS subsidy of Truvada as PrEP.