Health Canada / Santé Canada

Public Forum on the Selective Cox-2 Inhibitors NSAIDs

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Introduction

- **Osteoarthritis / Rheumatoid arthritis**
  - significant functional impact on patients
  - substantial costs to our health care system

- **Pharmacologic treatment**
  - temporary measure
  - long-term option

Coxib's

- **Conventional NSAIDs**
  - tremendous contribution to quality of life
  - varying gastro-intestinal safety concerns
  - multiple uses → → → wide distribution
    - short-term: dysmenorrhea, acute pain
    - long-term: family polyposis, osteoarthritis, rheumatoid arthritis

- **Selective Cox-2 inhibitors NSAIDs**
  - same benefit
  - safer gastro-intestinal profile

Post-marketing Pharmacovigilance

- Withdrawal of rofecoxib
  - Sept 2004
  - class effect ??
- Safety of coxib's
  - public health issue
  - regulatory issue
  - medical issue

Where do we go from here ?

- **Stakeholders: different approaches → different tools**
  - **pharmaco-epidemiology ≠ pharmacovigilance**
    - **different sciences**
    - **different perspectives on numbers**
    - **different interpretations of benefit / risk balance**

- **Protection of the Canadian Public: A Common Goal**
  - **risk assessment / risk management**

For rofe/cele/valde-coxib

- a) Do the available data support a conclusion that the drug significantly increases the risk of cardiovascular events?
- b) Does the overall risk versus benefit profile support marketing of the drug in Canada?
- c) Are there patient populations in which the potential benefits outweigh the potential risks ?
- d) What actions do you advise that Health Canada consider implementing to ensure the most appropriate use ?

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Regulatory Options applicable to coxibs

- Identification of a risk factor(s) (population at risk ?)
- Labeling update:
  - warnings/ contraindications
- Policies & practice guidance
  - new standards for blood pressure control
- Withdrawal
  - implications for patients who benefit
- Risk communications →→→ health care professionals; public

Post-marketing Safety Data

- What additional clinical trials or observational studies do you suggest are essential to further evaluate all NSAIDs ?

  A) potential cardiovascular risk

  B) potential benefits (*e.g.* reduced gastrointestinal risk)

New approvals: new approach ?

- What studies do you suggest should be completed and reviewed prior to the market authorization of new NSAIDs ?

A) evaluation of potential cardiovascular risk

B) evaluation of potential benefits (*i.e.* reduced gastrointestinal risk)

Rofecoxib

- If the sponsor chooses to apply for renewed marketing authorization, what information should be required from the sponsor for evaluation ?

Conclusion

Challenges: facing the future

- data inconsistencies → → clear advice
- having to compare apples to oranges: the domestic situatio
- what risk is acceptable ?