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14 January 2023

J Bruning
Via email: fyi-request-21102-a9fee3b4@requests.fyi.org.nz

Tēnā koe J Bruning

Request for information: Rolling reviews of safety & efficacy of COVID-19 treatments

Thank you for your request dated 11 November 2022 under the Official Information Act 1982 (OIA) for information relating to rolling reviews of safety & efficacy of (non-mRNA gene therapy) COVID-19 treatments.

In our letter of 9 December 2022, we extended the due date for making a decision on your request to 15 January 2023. I am pleased to now provide you with our response to your request.

Additionally, you may be interested to know that we regularly publish responses to OIA requests to our website. Search for "COVID-19 treatments" on our OIA responses webpage to read our other OIA responses regarding COVID-19 treatments.

In your request, you wrote:

> *1. Ronapreve, Baricitinib, Remdesivir, Tocilizumab, Molnuprivar, Paxlovid.*
> *Please provide me with:*
> *(a) The clinical trial data ID numbers used to claim efficacy and safety; and the date that the particular safety and efficacy data for these drugs were supplied.*
> *(b) Any evaluations of reviews published in the scientific literature that have analysed the (i) safety and (ii) efficacy of these drugs post release onto the market. This includes for prevention of hospitalisation and death as well as efficacy claims by the manufacturer.*
> *(c) All reviews of the scientific literature to understand state of knowledge on drug-drug interactions of these drugs in order to triangulate the claims of the manufacturer.*
> *(d) All current information regarding drug-drug interactions held with Pharmac for these drugs.*
>
> *2. …*
> *(a) Please provide evidence of rolling reviews undertaken to evaluate the evidence in the peer reviewed literature of any of the treatments listed in [the COVID-19 Science Updates report (Ministry of Health, 2021, Jul 9)].*

(b) Please supply all emails, reports and memos discussing vitamin D in relation to the scientific evidence relating to immune health, pneumonia, lower respiratory tract infections and other COVID-19 related pathophysiological symptoms considered by the COVID-19 Treatments Advisory Group.

3. Please advise the Access Criteria Assessment process for off-patent/repurposed drugs and nutrient formulations for treatment of COVID-19.

4. Does (a) Pharmac, Pharmacology and Therapeutics Advisory Committee (PTAC) or the (b) COVID-19 Treatments Advisory Group:

(i) recognise that nutrients and drugs with a long history of safe use, where the safety profile is well established; where off-patent use is cheaper than new medicines; carry a different cost-benefit profile than new medications?

(ii) Recognise the implications of the Cochrane review that RCTs are an overly strict requirement and quite unnecessary to demonstrate efficacy. Instead, observational studies are an equally valid study design…
Ref: Anglemyer A et al (2014) Healthcare outcomes assessed with observational study designs compared with those assessed in randomized trials. Cochrane Database of Systematic Reviews 2014, Issue 4. Art. No.: MR000034. DOI: 10.1002/14651858.MR000034.pub2.

Evidence used to assess funding of COVID-19 antiviral treatments

Medsafe is the authority responsible for regulating therapeutic products in New Zealand. Medsafe uses its evaluation and approval process to assess the safety and efficacy of medicines before they are approved for use in New Zealand. Some clinical trial information can be found in Data Sheets using Medsafe's Data Sheets and Consumer Medicine Information search tool. For more specific information related to question 1a of your request, please contact Medsafe.

In our response, we have not included any "evaluations of reviews that have analysed the (i) safety and (ii) efficacy of the above drugs, post-release onto the market" (question 1b) or; "reviews of scientific literature to understand state of knowledge on drug-drug interactions" (question 1c) – this is because we do not hold this information.

You may also find the meeting records of the COVID-19 Treatments Advisory Group useful as they contain details of the advisory group's discussions and recommendations about COVID-19 treatments. Please see the meeting records published on our website[1, 2, 3, 4, 5] for details of the advisory group's discussions and recommendations. We endeavour to publish meeting records for all our advisory committee and advisory group meetings as soon as possible following the conclusion of the meeting.

[1] https://pharmac.govt.nz/assets/2022-02-COVID-19-advisory-group-record-Oral-Antiviral-criteria.pdf
[2] https://pharmac.govt.nz/assets/2021-12-Covid-19-advisory-group-record-Nirmatrelvir-with-ritonivir-Pfizer-antiviral-record.pdf
[3] https://pharmac.govt.nz/assets/2021-10-21-COVID-Therapeutics-Advisory-Group.pdf
[4] https://pharmac.govt.nz/assets/2020-09-remdesivir-Covid-19-advisory-group-record.pdf
[5] https://pharmac.govt.nz/assets/2021-04-21-Tocilizumab-Record.pdf

Drug interactions of funded COVID-19 treatments

The Consumer Medicine Information (CMI) documents, which contain information about drug interactions, can be found using Medsafe's Data Sheets and Consumer Medicine Information search tool.

Pharmac does not hold information about specific drug interactions of funded treatments. Therefore, we have not provided the drug interaction information requested in question 1d, as allowed under section 18(d) of the OIA, as it is contained within the CMI documents which are publicly available via the Medsafe website.

Rolling reviews of COVID-19 treatments

COVID-19, and evidence of its burden and treatment, is constantly evolving and changing. Many of the treatments that have been developed are also new. Available evidence and the quality of evidence also continues to evolve.

The COVID-19 Treatments Advisory Group meets regularly to consider the latest information. Since it was established in 2021, the COVID-19 Treatments Advisory Group has considered a number of the treatments identified in Manatū Hauora's (Ministry of Health) *COVID-19 Science Updates report* dated 9 July 2021.

While Pharmac is responsible for determining which COVID-19 treatments are funded, Pharmac does not determine which treatments are prescribed in community or Te Whatu Ora hospital settings. Prescribers are responsible for determining which medicines are most suitable/appropriate for their patients regardless of whether they are registered by Medsafe or funded by Pharmac. See the Medsafe website for more information about the use of unapproved medicines and unapproved use of medicines.

Vitamin D for the treatment and/or prevention of COVID-19

Vitamin D has not been assessed by the COVID-19 Treatments Advisory Group for the treatment and/or prevention of COVID-19. However, Pharmac has received the materials listed below which were shared with us by a member of the Pharmacology and Therapeutics Advisory Committee (PTAC).

- *Can vitamin D protect against covid-19? Two new trials find no effect, but aren't the final word*, BMJ 2022;378:e071230, http://dx.doi.org/10.1136/bmj-2022-071230
- *Prevention of covid-19 and other acute respiratory infections with cod liver oil supplementation, a low dose vitamin D supplement: quadruple blinded, randomised placebo controlled trial*, BMJ 2022;378:e071245; http://dx.doi.org/10.1136/bmj-2022-071245
- *Effect of a test-and-treat approach to vitamin D supplementation on risk of all cause acute respiratory tract infection and covid-19: phase 3 randomised controlled trial (CORONAVIT)*, BMJ 2022;378:o1822; http://dx.doi.org/10.1136/bmj.o1822

I have not included a copy of the email sent to Pharmac staff by the member of PTAC, as allowed under section 18(h) of the OIA, as the email itself did not contain any information other than the attachments of the above materials. Furthermore, I have not included copies of the attachments listed above as these are already publicly available (section 18(d) of the OIA).

Determining access criteria for off-label use of funded medicines

In appropriate circumstances, Pharmac is open to funding medicines for off-label use. The process for considering funding, including access criteria, is fundamentally the same: we use our Factors for Consideration (FFC) for our assessment and get clinical advice. For the treatment of COVID-19, this would include a review of available evidence by our COVID-19 Treatments Advisory Group. As an example, tocilizumab is funded as an off-label treatment, as it is not currently approved by Medsafe for use in the treatment of COVID-19.

Cost-benefit of generic (off-patent) medicines

Pharmac recognises that generic ("off-patent") medicines are often cheaper (e.g., cost less for the same dose/quantity) than the original patented medicine. Where appropriate, we fund generic medicines to help us get the best health outcomes from our budget. Information about generic medicines is available on our website.

As stated earlier in this letter, COVID-19 and the treatment framework are constantly evolving and changing. Many of the treatments that have been developed are new and often come with a relatively high cost. In terms of their funding, COVID-19 treatments are funded through a separate fund outside the Combined Pharmaceutical Budget (CPB).

Clinical data sources used to assess efficacy

Pharmac recognises the value of observational studies when estimating relative treatment effects. We keep an open mind to all evidence and information that can inform and support our assessments. Please see our Prescription for Pharmacoeconomic Analysis, which has a section on evidence for relative clinical effect.

Closing

Thank you again for writing to us. We trust that the above information answers your queries.

Please note, you have the right to make a complaint to the Ombudsman about our response to your OIA, under section 28(3) of the OIA. Details of how to make a complaint are on the Ombudsman's website.

We are making our information more freely available, so we now publish selected OIA responses (excluding personal details) on our website. Please get in touch with us if you have any questions about this.

Nāku noa, nā

Peter Alsop
Director, Engagement and Implementation