ASSURING THE SAFETY, QUALITY & EFFICACY
OF VETERINARY MEDICINES

ATI 289

Request

From: [Redacted under section 40 of the FOIA]
Sent: 11 February 2014
Subject: Freedom of Information request - use of drug Convenia for cats in UK

Dear Sirs,

Would you please provide me in relation to the licensing and use of Convenia in the UK for cats :

1. Research reports, findings and reports of clinical trials conducted in the UK prior to licensing of the drug for use in the UK ;

2. Dated copies of any reports, warnings, updates or any other materials circulated by the VMD or known to the VMD and in either case issued to veterinary practitioners in the UK relating to the use , risks and side effects of Convenia in cats ;

3. Copies of all reports, complaints, representations and any other materials submitted to the VMD raising any issues or any concerns whatsoever relating to adverse effects (including death) in cats treated with Convenia in the UK (whether by veterinary practitioners, pet owners or any other persons or bodies including the regulatory bodies of veterinary practitioners;

4. Copies of any correspondence between VMD and the drug manufacturers in relation to any complaints or concerns raised in relation to the use of Convenia in cats in the UK.

VMD Reply

Sent: 10 March 2014
To: [Redacted under section 40 of the FOIA]
Subject: relating to the number of female and male researchers VMD employ

Thank you for your email dated 11 February 2014. We have dealt with your request under the Freedom of Information Act 2000 (FOIA).

In relation to the licensing and use of Convenia in the UK for cats you asked for:

1. Research reports, findings and reports of clinical trials conducted in the UK prior to licensing of the drug for use in the UK ;

2. Dated copies of any reports, warnings, updates or any other materials circulated by the [Veterinary Medicines Directorate] VMD or known to the VMD and in either case issued to veterinary practitioners in the UK relating to the use , risks and side effects of Convenia in cats ;

3. Copies of all reports, complaints, representations and any other materials submitted to the VMD raising any issues or any concerns whatsoever relating to adverse effects (including death) in cats treated with Convenia in the UK (whether by veterinary practitioners, pet owners or any other persons or bodies including the regulatory bodies of veterinary practitioners;

4. Copies of any correspondence between VMD and the drug manufacturers in relation to any complaints or concerns raised in relation to the use of Convenia in cats in the UK.

Our Reply

As a general point you should note that the FOIA gives you an entitlement to information rather than documents and it is in this context that we have answered your request taking account of the information we hold. As Convenia is a centrally authorised product such information you request would be held by the European Medicines Agency (EMA) and not the VMD.

You may also wish to be aware of a previous FOIA request relating to feline veterinary medicines by injection, which you can see under ATI216 (2012) via the following link:

http://www.vmd.defra.gov.uk/business/ati_disclosure.aspx

Part 1 of your request

Information on the clinical trials and other studies conducted prior to the authorisation of Convenia for use in the UK is published on the EMA website. The link to this information is:

http://www.ema.europa.eu/ema/index.jsp?curl=pages/medicines/veterinary/medicines/000098/vet_med_000108.jsp&mid=WC0b01ac058001fa1c

This linked page contains a series of tabs and documents, each providing information on Convenia. The most detailed of these is the 'scientific discussion' document (fourth tab: "assessment history") which is a detailed summary of the studies which were assessed before the product was authorised in 2006.

Regarding your specific interest in clinical trials conducted in the UK, I draw your attention to page 15 of the scientific discussion document. Two clinical trials were conducted in cats. Both were multicentre European trials, and although it is not stated in the document I can confirm that both of these trials included cats which were clinical patients in the UK.

Although not clinical trials, you may also be interested in the summary of target animal safety studies on page 12 of the same document. These are laboratory studies which provide information on the margin of safety of the product after single and repeated administration of different doses (including overdose) in cats. These studies were not conducted in the UK.

Under section 21 of the FOIA we do not have to provide this information because it is accessible to you via a website. Section 21 recognises that the right of access is supplementary to the many ways in which public authorities already provide information to members of the public.

Since Convenia was first authorised, no changes to the authorisation have been made on the basis of new clinical studies in cats (i.e. no further clinical studies in cats have been received or assessed in the context of this product). One new warning about adverse effects (very rare gastrointestinal signs including emesis – vomiting - and diarrhoea in dogs and cats) was added to the summary of product characteristics (SPC) in 2008 after the product was first authorised. Another warning (very rare injection site reactions in dogs and cats) was added at the time of the renewal of the licence to reflect safety information received from the field since the first placing on the market. These warnings were added as a result of pharmacovigilance reporting which is explained in more detail below. This is normal practice for all products marketed in the European Economic Area**.**

Parts 2, 3, and 4 of your request

In order to respond to these parts of your request it is helpful if we provide you with some background to pharmacovigilance as this is the source of the information we hold relating to your request for information.

After a veterinary medicine is authorised and placed on the market, the company that produces and markets the product works closely with national regulatory agencies across the world, including the VMD in the UK, to monitor all reported suspected adverse events involving the medicine. Adverse events include suspected adverse reactions, suspected lack of efficacy, environmental incidents and suspected residue violations.

The purpose of this process, which is known as pharmacovigilance, is to ensure that the balance between the benefits and risks of authorised medicines remains favourable. Adverse events reported to the VMD (including those received by owners, vets and marketing authorisation holders) are recorded on the VMD's database and the information below therefore encompasses such reports.

Pharmacovigilance covers all suspected adverse events that occur after the administration of a medicine, regardless of the strength of evidence as to their relationship with the medicine, or whether or not the medicine was used in accordance with its label or leaflet. The frequency with which adverse events occur can be calculated

for a particular medicine. While this information is valuable, numerical data based on a voluntary reporting system are unlikely to reflect the full picture. Many adverse events are complicated by factors such as the health of the animal, or the concurrent use of other medicines. In some cases, it may be concluded that it is unlikely that the product was involved in the reported events and when full investigations are carried out, the investigations may indicate the more likely cause of the reported adverse event. . It is important to take into account the limitations of adverse event reporting and evaluation when interpreting pharmacovigilance data.

The VMD has agreed with industry to provide adverse event incidence figures in response to enquiries about the numbers of adverse events reported in a given period. This enables the VMD to provide information about adverse event incidence in the context of sales volumes without disclosing commercially sensitive details.

Convenia is authorised for use in both dogs and cats but due to various factors such as its cost and the difficulty in administering tablets to cats, it is estimated that approximately 90% of the product is used in this species. From the date of authorisation, up until the latest sales figures received, the overall incidence of reactions in dogs and cats was 0.00751%, which equates to between 7 and 8 animals reported as having any kind of adverse reaction to Convenia per hundred thousand animals treated.

No cases have been excluded from this analysis (even if assessed to be unlikely to be due to the product), so this represents the worst case scenario. As a general rule, further investigations are initiated when reaction incidence exceeds 0.01%, or 1 animal reacting per 10,000 animals treated.

From this same analysis, the table below shows the 20 most commonly reported signs and the incidence at which they have been reported. From this it can be seen that the majority of these (those that are shaded) are already reflected in the SPC as Sections 4.3 and 4.5 warn of the possibility of hypersensitivity reactions (anaphylactic shock) to this class of antibiotic and Section 4.6 of the SPC gives the following information on known adverse reactions for the product:

“On very rare occasions gastrointestinal signs, including emesis and/or diarrhoea, have been observed. In very rare cases neurological signs and injection site reactions have been reported after the use of the product.”

The remaining (unshaded) signs generally reflect the conditions in which the product is used, either by the health status of the animal (sick and often elderly patients) or the skin and soft tissue infections being treated. Again, these figures represent the worst case scenario as no cases have been excluded, even when the product was assessed as being unlikely to be responsible.

Death	0.00236
Emesis (vomiting)	0.00092
Lethargy	0.00094
Anorexia (not eating)	0.00087
Lack of efficacy	0.00073
Ataxia (difficulty in walking)	0.00059

Diarrhoea	0.00038
Injection site hair change	0.00026
Convulsion	0.00038
Polydipsia	0.00031
Loss of consciousness	0.00026
Dermatitis and eczema	0.00021
Dyspnoea (difficulty in breathing)	0.00038
Allergic oedema	0.00019
Muscle tremor	0.00019
Pruritus (itching)	0.00024
Collapse NOS (not otherwise specified)	0.00024
Mydriasis (dilated pupils)	0.00017
Hyperthermia (high temperature)	0.00026
Dehydration	0.00024

Our Service
If you are unhappy with the service you have received in relation to your request and wish to make a complaint, you may request an internal review within two calendar months of the date of this e-mail. If you would like to request an internal review please write to [Redacted under section 40 of the FOIA] at the VMD via ati@vmd.defra.gsi.gov.uk. If you are not content with the outcome of the internal review you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF