RESTRICTED COMMERCIAL

SCOP/95/9TH MEETING CPS/CSM 95/10TH MEETING

NOT FOR PUBLICATION

COMMITTEE ON SAFETY OF MEDICINES

SUB-COMMITTEE ON PHARMACOVIGILANCE

SUB-COMMITTEE ON CHEMISTRY, PHARMACY AND STANDARDS

Title of Paper:

Variation Application to Request a.Change in Legal Status for Carbocisteine as an expectorant

Type of Paper: UK POM to P request.

Product:	Assessors:			
Active Constituents:	Previous assessments:			
Carbocisteine	None			
Therapeutic classification:				
Mucolytic				
Legal Status: Pharmacy status requested				
Company name:				
Sale and Supply:				
From registered pharmacies only				

Index	Page
Background	1
Assessment	2
Assessors' Conclusions	7
Index of Attachments	8

1. INTRODUCTION

for 3 products, [Annex products as Prescription only medicine]	I) The currently licensed indications for the es are:-
agent for the adjunction characterised by excessive or v	active therapy of respiratory tract disorders iscous sputum."
(Further qualified for otitis media (glue ear) and chro	and and"including suppurative onic obstructive airway disease")
The company wish to make the productions indications:	cts additionally available for Pharmacy sale with the
for the treatment of conditions	ty of mucus, helping expectoration. Recommended of the respiratory tract (chest, throat, airways) quired such as in chesty coughs including those ditions."
(Bronchitic conditions not incli	uded for
No change is requested in the licensed	dose i.e.
Adults - Initially 2250 m Maintenance 15	
Children - 20mg/kg/day.	
	view of the efficacy and safety data available, adjunctive therapy in the treatment of chronic disease.
2. BACKGROUND	
1956, it was first licensed in the UK in This is the first application carbocisteine from Prescription Only M	the POM order. Although available for use since a 1972 as the solution to request a change in the legal status for Medicine to a Pharmacy Medicine. Other mucolytic currently POM. Other expectorants such as

This is an application to change the legal status of carbocisteine to permit Pharmacy sale

guiaphenesin, which has a different mode of action from carbocisteine, are GSL.

including Ireland, Germany and the Netherlands.

Carbocisteine is available as an "over-the-counter" medicine in other EEC member states,

3. PHARMACEUTICAL ASSESSMENT

The applications are variations to granted licences and there are no quality issues of concern.

Label and Leaflets

The proposed labels and leaflets are satisfactory, subject to approval of the Pharmacy availability and resolution of the following queries:

- 3.1 <u>Product Names</u> Suitable names should be proposed to differentiate between the P and POM products.
- 3.2. <u>Labels</u> Where appropriate, these should state the sodium content; that the product contains lactose (salts and esters) and in the case of the parahydroxybenzoic acid (salts and esters) and sucrose.

4. MEDICAL ASSESSMENT

4.1 Medical Background

"Mucolytics are often presented to facilitate expectoration by reducing sputum viscosity in chronic asthma and bronchitis. Few patients, however, have been shown to derive much benefit from them although they do render sputum less viscid" (BNF Number 30, September 1995 - Annex 2(a)).

"Various compounds have been reported to act as expectorants, but there is little incidence that any of them is of any practical value... Mucolytic expectorants supposedly act by decreasing sputum viscosity. Although they can certainly be shown to have that effect (*in-vitro*), their efficacy is unproven, and they are probably no better then inhalations of steam or menthol." (pg.302 - Annex 2(b)).

has not been firmly established and the case for its use is "not proven". This is reflected in its no longer being available on a British National Health Service prescription - except for patients under the age of 18 years who have airways disease or damage which has required tracheotomy.". (Annex 2(c)).

The assessors' therefore conclude that the therapeutic utility of mucolytics in general, and of carbocisteine specifically, remains ill defined.

4.2 Pharmacology

Acetylcysteine decreases the viscosity of sputum by splitting the disulphide bonds of glycoprotein chains. Carbocisteine is a derivative in which the disulphide group is blocked by a carboxylic acid residue. It may be only partly, if at all, directly mucolytic, and its major action is thought to be on the metabolism of

mucus-producing cells. The mucus produced has an increased sialomucin content and a reduced fucomucin content. Sialomucins influence the rheological properties of mucus and may also, through inhibition of kinins, reduce or prevent bronchial inflammation and bronchospasm.

4.3 Pharmacokinetics

Carbocisteine is promptly absorbed after oral administration and the kinetics fit a one-compartment open model. Peak concentration is reached at 1.09 hours for syrup preparations and 1.70 hours for capsules. The plasma half-life is estimated at 1.33 hours and the apparent volume of distribution is 60.4 hours.

4.4 Efficacy

4.4.1 Clinical Pharmacology Studies

Four clinical pharmacology studies are cited by the Clinical Expert in support of the effect of carbocisteine treatment on mucociliary clearance in the proposed non-prescription indication, although all were conducted in patients with chronic lung disease. (Table I, pg 10, Clinical Expert Report - Annex III).

Two of the studies failed to show a treatment effect. Only the Todisco study in COAD (n=10, 6 with Ca bronchus) demonstrated significantly improved mucociliary clearance, but at a dose considerably in excess of the initial licensed dose of 2.25gms, when administered for 15 days. Stratification of the Kohler study (n=18) demonstrated improved clearance in the sub-group with poor clearance at baseline. (The daily dose was low (1.125g) however.)

The assessors note that no consistent effect was demonstrable at 7 days or less (the potential target population for the proposed 'chesty cough indication'), the verification of low initial mucociliary clearance would require hospital diagnosis, and no studies have been conducted in patients with acute respiratory illness relevant to the proposed Pharmacy indications.

4.4.2 Clinical Studies in Adults

The applicant has identified and summarised 29 controlled clinical studies among their unpublished studies and from the published literature (including the 4 clinical pharmacology studies above), involving 1214 patients, 656 of whom received carbocisteine treatment. The clinical expert refers to the fact that 28 of these studies demonstrated a beneficial effect in some or all of the parameters evaluated, and is consistent with efficacy in the currently licensed indications. (Annex III, pg11).

The clinical expert argues that "the beneficial effects of carbocisteine in relieving the symptoms of productive cough are useful whether the cause of the cough is chronic bronchitis or a more acute condition such as the common cold (Annex III pg. 9). This extrapolation may well not be justifiable, and the reference to the common cold may in particular be inappropriate and suggests a potential for misuse if the indication requested was approved.

The clinical expert further identifies and lists in Table II, 10 of those studies as being "the best reported of the double blind studies" and the assessors therefore conclude that the remainder provide little data of adequate standard.

All the "best reported studies" included only patients with chronic obstructive airways disease, bronchiectasis or chronic asthma. They are of limited relevance to the requested indication. The assessors' further note that differential clinical benefit was supported by objective lung function tests in only 3 studies.

4.4.3 Clinical Studies in Children

The clinical expert states that efficacy in children with respiratory disease has been less extensively studied than in adults. Eight trials were identified involving 389 children in total (Table III pg. 15/16- Annex III). Only one study was a randomised double-blind controlled study (vs. placebo) and this utilised a 30mg/kg dosage regimen, which is considerably in excess of the licensed dose of 20mg/kg. Nevertheless 'ease of expectoration' and 'overall clinical evaluation' were superior to placebo.

Only 'supportive' evidence of efficacy in children is available.

4.5 Safety

4.5.1 Clinical Trials in Adults

Documented adverse event data are available from 22 studies involving 548 patients who received carbocisteine and 323 patients who received placebo, and are summarised in Table IV, pg. 18 - Annex III. It should be noted that the age range is quoted as 40 to 80 years (no mean) and treatment duration varied from 4 days to 6 months.

The incidence of adverse events reported was lower on carbocisteine (6.4%) than that on placebo (9.3%) and in both groups were most frequently minor gastrointestinal disturbances. Attribution was confounded by concomitant therapy with antibiotics or cortico-steroids.

There were few serious adverse events (atrial fibrillation and acute heart failure in 2 carbocisteine patients, and status asthmaticus in one placebo patient) and were considered not unexpected in the age group and with the disease history of the patients being treated. Only occasional minor and clinically insignificant laboratory abnormalities were reported, and where recorded there were no effects on ECG, blood pressure or heart rate.

An additional large open general practice study in Germany, involving 340 patients, of whom interestingly 14 received carbocisteine 2.25g daily as **monotherapy** for up to 14 or 21 days. Side-effects were reported in 20 patients (5.9%), again most commonly gastralgia, only 3 of whom received carbocisteine alone (Table VII, pg. 20 - Annex III).

4.5.2 Clinical Studies in Children

There were only 4 isolated reports of minor adverse events from an exposed population of 272 patients, 126 (44%) of whom were 5 years old or less. (TableVIII, pg. 21 - Annex III)

4.5.3 Spontaneous Reports of Suspected Adverse Reactions

Three potential interactions were reported:

There are 119 reports of 153 suspected adverse reactions on the ADROIT database up to 6 October 1995, and no new ADR's have been reported since tabulation and review of the reports by the Clinical Expert in April of this year. (Table IX, pg. 22, Annex III, UK DAP 6.10.95 - Annex IV).

Skin and sub-cutaneous tissue disorders were most frequently reported (42%), most commonly rashes (31) or urticaria/angioedema (18). Gastrointestinal disorders account for 15% of reactions, including 4 cases of bleeding. Concomitant medication, particularly antibiotics, was frequent. None of the reactions were fatal.

reported increased

somnolence when carbocisteine was	prescribed for 3 days for a 64 year old				
receiving phenobarbitone: reported hallucinations occurring for					
one day in a 67 year female receiving	g acyclovir, folic acid, aludrox, naproxen,				
alfacalcidol and buprenorphine: describes a 9 year old who					
suffered a recurrence of convulsions	previously well controlled on carbamazepine				
for six weeks and in whom a positive					
written since 1980. The reporting rand not more than 0.003% overall, and 0	te for all carbocisteine products is therefore .0001% for serious gastrointestinal events. the overall reporting rate for children was				
There is one foreign suspected ADR	report on the ADROIT database				

There is one foreign suspected ADR report on the ADROIT database (and the ADROIT database). This is a complex and confounded case report from Japan, occurring in an 18 year old male who was treated with cefadronil, cefpodoxime, naproxen, mequitazine and carbocisteine for a respiratory tract infection and developed Stevens-Johnson syndrome, disseminated intravascular coagulation and fatal multiple organ failure. The Company briefly refer to 2 further reports from Germany, including one of gastrointestinal symptoms and one of dyspnoea.

The assessors note that the Spontaneous Reporting Rate is low, and that no serious and unexpected adverse reactions have been reported. Gastric upset appears to be the most consistently reported adverse effect. No safety concerns emerge from these data.

4.5.4 Safety in Overdose

The clinical expert reports that the Medical Toxicology Unit of Guy's and St Thomas' Hospital Trust indicates that was involved in 46 cases of overdose, 38 of which were asymptomatic. Symptoms reported included vomiting, abdominal pain, hysteria/aggression following ingestion of 20 capsules, drowsiness which in one case followed ingestion of 100ml syrup, and tachycardia. The Medical Toxicology Unit concluded that carbocisteine has a low order of toxicity in acute overdosage.

4.5.5 Other Safety Considerations

There are no known clinically important drug interactions with One safety study was however conducted by Domshke et al (Acta Hepato-Gastroenterol 1976; 23: 213-5) in 10 healthy male volunteers to assess the effect of the licensed dose of on gastric secretions. No differences were detected during either basal gastric secretion or pentagastrin-stimulated secretion.

4.6 Basis for Legal Classification - Assessors Comments

The criteria for classifying medicinal products as Prescription-only Medicines and an Aide-memoir on making POM to P switches are appended as Annexes Va and Vb.

The assessors conclude that the indications for use of should remain restricted to the currently licensed indications for use as adjunctive therapy in the absence of any substantive data for efficacy in the treatment of "chesty coughs".

The therapeutic utility of mucolytics in general, and specifically carbocisteine remains ill defined despite investigation and use over many years in the licensed indications. Usage in children may be predominantly for chronic respiratory conditions such as cystic fibrosis or bronchiectasis. Efficacy has not been demonstrated in "chesty coughs" either in adults or children. It therefore appears that products "contain substances or preparations thereof the activity and/or side effects of which require further investigation".

It is submitted that is unsuitable for self medication and self-diagnosis. The data available clearly indicate that the medical prescription of the adjunctive therapy of chronic obstructive airways disease (bronchietiasis/chronic asthma) is in the nature of an individual therapeutic trial and clinical responders cannot be identified with certainty before exposure. Frequent medical assessment and supervision is required on a regular basis. It therefore follows that "they are likely to present a direct or indirect danger to

human health, even when used correctly, if used without the supervison of a doctor (or dentist)".

Furthermore, were the requested indications for a Pharmacy product agreed, use in children or adults for "chesty coughs" might well delay medical advice for potentially life threatening respiratory tract infections. products could therefore be "frequently and to a very wide extent used incorrectly, and as a result would be likely to present a direct or indirect danger to health".

5. ASSESSORS' CONCLUSIONS

No evidence of efficacy in the proposed indications for use as a Pharmacy product has been submitted.

The therapeutic utility of carbocisteine remains ill defined. The appropriate use of carbocisteine within the existing licensed indications requires careful and frequent medical assessment and supervision on a regular basis. Pharmacy legal status is therefore inappropriate.

There are no direct safety concerns.





INDEX OF ATTACHMENTS

Annex 1	Product Licence	Variation -	· MLA	201/Labels	and Leaflets

Annex II

- (i) BNF No 30, Sept. 1995, pg. 142/3, Mucolytics
- (ii) Expectorants, Grahame-Smith & Aranson 1992, pg. 302.
- (iii) Carbocisteine, Dollery 1991, pg 71-71
- Annex III Clinical Expert Report
- Annex IV Carbocisteine ADROIT DAP

Annex V

- (i) Criteria for Clarifying Medicinal Products as Prescription Only Medicines
- (ii) Aid memoir on making POM to P Switches

Name of MA holder:	Pro	oduct name:	-	٠	
					· · ·
MA number:			•		

RELATED APPLICATIONS (S) (Please specify including date of pending renewal application(s))

BACKGROUND (Please give brief background explanation for the proposed changes to your MA)
APPLICATION SEEKING CHANGE IN LEGAL STATUS FROM PRESCRIPTION ONLY
MEDICINE TO PHARAMCY MEDICINE

(Specify the precise present and proposed wording or specification. For SPC changes, underline or highlight the changed words and attach a complete new version)

PRESENT	PROPOSED
TRESULT	TROI OSED
LEGAL STATUS	LEGAL STATUS
PRESCRIPTION	PHARAMCY
RECOMMENDED CLINICAL INDICATIONS AND ROUTE OF ADMINSTRATION MUCOLYTIC AGENT FOR THE ADJUNCTIVE THERAPY OF RESPIRATORY TRACT DISORDERS CHARACTERISED BY EXCESSIVE OR VISCOUS MUCUS.	RECOMMENDED CLINICAL INDICATIONS AND ROUTE OF ADMINSTRATION WHEN PRESCRIBED BY A DOCTOR MUCOLYTIC AGENT FOR THE ADJUNCTIVE THERAPY OF RESPIRATORY TRACT DISORDERS CHARACTERISED BY EXCESSIVE OR VISCOUS MUCUS
	WHEN SOLD IN A PHARAMCY WITHOUT A DOCTORS PRESCRIPTION
	REDUCES THE VISCOSITY OF MUCUS, HELPING EXPECTORATION. RECOMMENDED FOR THE TREATMENT OF CONDITIONS OF THE RESPIRATORY TRACT (CHEST, THROAT, AIRWAYS) WHERE LOOSENING OF MUCUS IS REQUIRED SUCH AS IN CHESTY COUGHS.

I hereby make application for the above Marketing Authorization to be varied in accordance with the proposals given above and certify that the changes will not adversely affect the quality, efficacy or safety of the product. I declare that amended documents have been supplied and that the supporting information, where appropriate, meets the Type I conditions or supports the proposed Type II change. I declare that all changes have been identified and that there are not other changes in the amended documentation.

identified and that there are not other changes in the amended documentation.

Fees paid. Please specify category under National/Community rules

Amount/Currency

Main Signatory

Status (Job title)

Print name

Date

Date

Print name

Date



Name of MA holder:		Product name:	
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MA number:	 The state of the s	· And the second of the second	

RELATED APPLICATIONS (S) (Please specify including date of pending renewal application(s))

BACKGROUND (Please give brief background explanation for the proposed changes to your MA)
APPLICATION SEEKING CHANGE IN LEGAL STATUS FROM PRESCRIPTION ONLY
MEDICINE TO PHARAMCY MEDICINE

(Specify the precise present and proposed wording or specification. For SPC changes, underline or highlight the changed words and attach a complete new version)

X

PRESENT	PROPOSED
LEGAL STATUS	LEGAL STATUS
PRESCRIPTION	PHARAMCY
RECOMMENDED CLINICAL INDICATIONS AND	RECOMMENDED CLINICAL INDICATIONS AND
ROUTE OF ADMINSTRATION	ROUTE OF ADMINSTRATION WHEN PRESCRIBED BY A DOCTOR
MUCOLYTIC AGENT FOR THE ADJUNCTIVE	
THERAPY OF RESPIRATORY TRACT	MUCOLYTIC AGENT FOR THE ADJUNCTIVE
DISORDERS CHARACTERISED BY EXCESSIVE OR VISCOUS MUCUS, INCLUDING	THERAPY OF RESPIRATORY TRACT DISORDERS CHARACTERISED BY EXCESSIVE
SUPPURATIVE OTITIS MEDIA (GLUE EAR) AND	OR VISCOUS MUCUS, INCLUDING
CHRONIC OBSTRUCTIVE AIRWAY DISEASE	SUPPURATIVE OTITIS MEDIA (GLUE EAR) AND
	CHRONIC OBSTRUCTIVE AIRWAY DISEASE
	WHEN SOLD IN A PHARAMCY WITHOUT A
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and the second of the second o	DEDUCES THE LISSOCITY OF
	REDUCES THE VISCOSITY OF MUCUS, HELPING EXPECTORATION.
	RECOMMENDED FOR THE TREATMENT OF
	CONDITIONS OF THE RESPIRATORY TRACT
	(CHEST, THROAT, AIRWAYS) WHERE
	LOOSENING OF MUCUS IS REQUIRED SUCH AS
	IN CHESTY COUGHS, INCLUDING THOSE
	ASSOCIATED WITH BRONCHITIC CONDITIONS.

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Fees paid. Please specify category under National/Community rules

Amount/Currency

Main Signator

Status (Job title)

Print name

Date 26 6 95

Second Signatory (where appropriate

Status (Job title)

Name of MA holder:	 	roduct name:	-	
¥	 -			
MA number:				

RELATED APPLICATIONS (S) (Please specify including date of pending renewal application(s))

BACKGROUND (Please give brief background explanation for the proposed changes to your MA)
APPLICATION SEEKING CHANGE IN LEGAL STATUS FROM PRESCRIPTION ONLY
MEDICINE TO PHARAMCY MEDICINE

(Specify the precise present and proposed wording or specification. For SPC changes, underline or highlight the changed words and attach a complete new version)

PRESENT	PROPOSED
LEGAL STATUS	LEGAL STATUS
PRESCRIPTION	PHARAMCY
RECOMMENDED CLINICAL INDICATIONS AND	RECOMMENDED CLINICAL INDICATIONS AND
ROUTE OF ADMINSTRATION	ROUTE OF ADMINSTRATION
	WHEN PRESCRIBED BY A DOCTOR
MUCOLYTIC AGENT FOR THE ADJUNCTIVE	
THERAPY OF RESPIRATORY TRACT	MUCOLYTIC AGENT FOR THE ADJUNCTIVE
DISORDERS CHARACTERISED BY EXCESSIVE	THERAPY OF RESPIRATORY TRACT
OR VISCOUS MUCUS, INCLUDING	DISORDERS CHARACTERISED BY EXCESSIVE
SUPPURATIVE OTITIS MEDIA (GLUE EAR) AND	OR VISCOUS MUCUS, INCLUDING
CHRONIC OBSTRUCTIVE AIRWAY DISEASE	SUPPURATIVE OTITIS MEDIA (GLUE EAR) AND
	CHRONIC OBSTRUCTIVE AIRWAY DISEASE
	WHEN SOLD IN A PHARAMCY WITHOUT A
	DOCTORS PRESCRIPTION
	DOUGHT HOUSE
	REDUCES THE VISCOSITY OF
	MUCUS, HELPING EXPECTORATION.
	RECOMMENDED FOR THE TREATMENT OF
	CONDITIONS OF THE RESPIRATORY TRACT
	(CHEST, THROAT, AIRWAYS) WHERE
	LOOSENING OF MUCUS IS REQUIRED SUCH AS
	IN CHESTY COUGHS, INCLUDING THOSE
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Fees paid. Please specify category under National/Community rules

Main Signator

Status (Job title)

Print name

Date 23/6/95

Second Signatory (where appropriate

Front surface of carton/bottle label.

Loosens and clears difficulty chesty coughs including those associated with bronchitic conditions. Rear surface of Carton/Capsule container. Each capsule contains 375 mg carbocisteine. loosen and clear difficult chesty coughs including those associated with bronchitic conditions. When prescribed by a doctor it may be used in the treatment of glue ear. Dose: Adults including the elderly: Two capsules three times a day One capsule 4 times a day. When the chesty cough begins to improve. Children: Should use If symptoms do not improve you should consult your doctor. if you have a stomach ulcer. You should not use If you are pregnant or breast feeding your baby you should only use is not recommended in the first they have been prescribed for you by your doctor. trimester of pregnancy. do not normally have any effects on the ability to drive or operate machinery.

Keep all medicines out of the reach of children.

Legal Status P

Lot no. Expiry date

Front sur	face of	carton/	bott	le la	bel.

Loosens and clears difficult chesty coughs including those associated with bronchitic conditions.

Rear surface of carton/bottle label.

Each 5 ml contains 250 mg carbocisteine.

loosens and clears difficult chesty coughs including those associated with bronchitic conditions.

When prescribed by a doctor it may be used in the treatment of glue ear.

Dose:

Adults including the elderly:

Initial Dose:

Three 5 ml spoonfuls three times a day

When an improvement is noticed dose should be

reduced to:

Two 5 ml spoonfuls three times a day.

Children: She

Should use

If symptoms do not improve you should consult your doctor.

You should not use if you have a stomach ulcer.

If you are pregnant or breast feeding your baby you should only use the state of pregnancy. If it has been prescribed for you by your doctor. It is not recommended in the first trimester of pregnancy.

You should not take at the same time a Pholoodine Linctus (a medicine for suppressing coughs) and neither should be mixed with Pholoodine Linctus.

does not normally have any effects on the ability to drive or operate machinery.

Keep all medicines out of the reach of children.

Store below 25°C.

Legal Status P

Lot No.

Expiry Date:

Carton & Label Text for

groom en en en	Front surface of carton/bottle label.
	Loosens and clears difficult chesty coughs.
	Rear surface of carton/bottle label.
and the second of the second o	Each 5 ml contains 125 mg carbocisteine.
	loosens and clears difficult chesty coughs.
•	Dose:
in the	Children aged 5-12 years Two 5 ml spoonfuls three times a day. 2-5 years Half to one 5 ml spoonful four times a day.
	If symptoms do not improve medical attention should be obtained.
•	You should not give if your child has stomach troubles.
en e	should not be used by anyone who is pregnant or breast feeding a baby unless it has been prescribed by a doctor. It is not recommended in the first trimester of pregnancy.
ena Alba eng	Does not normally cause any drowsiness
•	Keep all medicines out of the reach of children.
	Store in a cool place.
	L'egal Status P
	e de la companya del companya de la companya del companya de la co

Expiry Date:

Lot No.

Patient Information Leaflet

Each capsule contains 375 mg carbocisteine. It also contains magnesium stearate, Aerosil (colloidal silicon dioxide), lactose, sodium lauryl sulphate. The gelatin capsule contains E102.
This pack contains 30 capsules.
is a medicine which reduces the viscosity (loosens) mucus particularly in chest coughs thereby easing and soothing.
is manufactured by
What is for?
is recommended for difficult chesty coughs including those associated with bronchitic conditions where it loosens and clears difficult mucus.
When prescribed by a doctor control can be used in the treatment of glue ear
When should you not use
You should not use if you have a stomach ulcer.
You should not take if you are pregnant or breast feeding your baby unless it has been prescribed for you by you doctor. It is not recommended in the first three months of pregnancy.
does not normally have any effects on the ability to drive or operate machinery.
What is the dose of the control of t
Adults (including the elderly).
Initial Dose: Two capsules three times a day When the chesty cough begins to improve reduce dosage to: One capsule four times a day
Children: Should use If symptoms do not improve you should consult your doctor.

If more than the recommended amount of advice from your doctor or nearest hospital casualty department.

are taken you should seek

Can unwanted effects occur after using	Capsules?	
		TOWAND CONTRACTOR STATE
Rarely there have been reports of skin rashes and gureatment with	astro-intestinal	disturbances following
If you notice anything unusual you should ask you	r doctor.	
should not be taken if the cap	sules have passe	ed the expiry date in the
g <mark>label.</mark> The more property and the second		and the second s
Keep all medicines out of the reach of children		
Data of accompanion: June 1006		

If you would like more information about the medicine we recommend that you ask your Pharmacist.

Patient Information Leaflet

Each 5 ml spoonful of	contains 250 mg carbocisteine.
It also contains Nipagin in Sodium, sodium hydroxide, hydrochloric acid	sucrose, caramel liquid, rum and cinnamon flavours d and water.
This pack contains 200 ml	
is a medicine which chesty coughs thereby easing and so	ch reduces the viscosity (loosens) mucus particularly in othing.
is manufactured b	y
What is for?	
is recommended for the with bronchitic conditions where it	reatment of chesty coughs including those associated loosens and clears difficult mucus.
When prescribed by a doctor	may be used in the treatment of glue ear.
When should you not use	2
You should not use if you	u have a stomach ulcer.
You should not take it has prescribed for you by your do months of pregnancy.	if you are pregnant or breast feeding your baby unless ctor.
You should not take suppressing coughs) and neither sho	at the same time as Pholcodine Linctus (a medicine for ould you mix Pholcodine Linctus with
does not normally machinery.	have any effects on the ability to drive or operate
What is the dose of	2
Adults (including the elderly) Initial Day: When an improvement is noticed dose should be reduced to:	Three 5 ml spoonfuls three times a day. Two 5 ml spoonfuls three times a day.
Children: should use If symptoms do not improve you sh If more than the recommended amo from your doctor or nearest hospita	ount of is taken you should seek advice

Rarely there has	ve been reports of skin rashes and gastro-intestinal disturbances following
treatment with	If you notice anything unusual you should consult your doctor.
-	
	should not be taken if the syrup has passed the expiry date on the label.

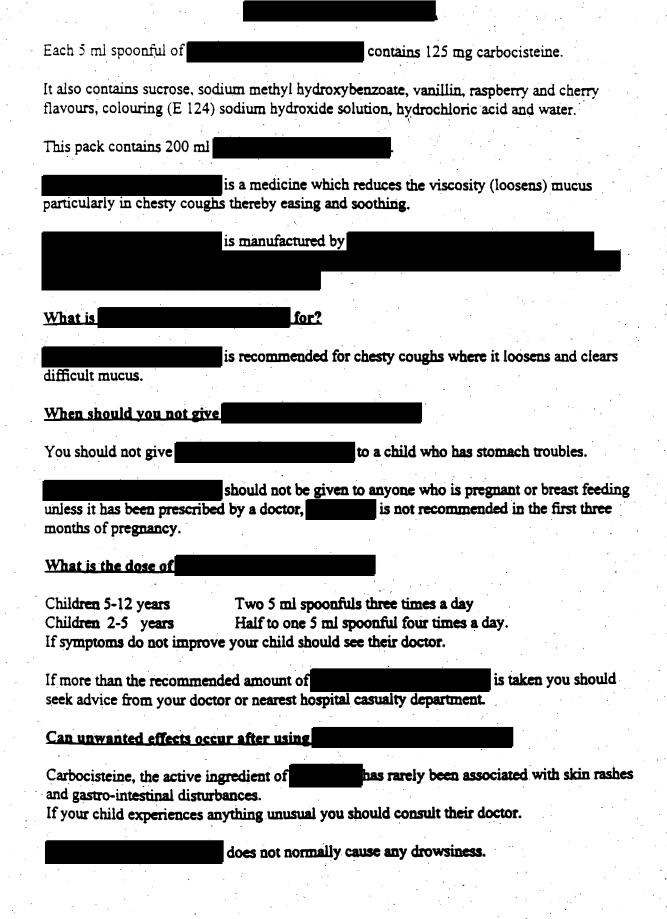
should be stored below 25°C

Keep all medicines out of the reach of children.

Date of Preparation June 1995

If you would like more information about this medicine we recommend that you ask your Pharmacist.

Patient Information Leaflet



should not be taken if the syrup has passed the expiry date on the

label

The syrup should be stored in a cool place.

If your pharmacist needs to dilute this product for you, this should be carried out with Unpreserved Syrup B.P. and the diluted preparation should not be used beyond 14 days after dilution.

Keep all medicines out of the reach of children.

Date of preparation: June 1995

If you would like more information about this medicine you should consult your Doctor or Pharmacist.

leas of pharmacy commactors who provide domeath COMPLES HOST VALVEY

ance thanks anchade the Intersurpreal 005 Mask and supplied to the patient varies with the rate of flow or Centimask MK IV 28% are constant performance gen (28/2) over a wide tange irrespective of the the Venticane Mask, the concentration of oxygen masks and provide a nearly constant supply of oxymounts premium battern. The variable perform of overgen and also with the patient's breathing patble performance masks. The intersurgical 040-289 Panents are supplied with either constant or vaira

OVICE A CONCLAIRATORS

tions is rige, administration of rospen fall least is an artista may probably survival in patients w evere chroine obstructive aifways disease with mbusak

nearment should be provided for patients who fo Department of Realth goddelines suggest that the following criteria

P.O. < 7 3kPa. P.CO. > 6kPa.

FEV; < 1.5 late and EVC < 2 late

mans at least three weeks apart after the patient has The measurements should be stable on two occareceived appropriate broncheddator therapy.

Expannent of Health suggests that these patients should not be defined this form of treatment but the effects of long-term therapy have not yet been Less information is available on long-term oxygen in panents with a similar degree of hypoxaemia and author obstruction but no hypercapma; the execute completely.

contations of oxygen is seldom a problem in paneurs with stable respiratory failure although it may occur during evacerbanous, patients and rela-mes should be warred to call for medical help if Increased respiratory depression from fow condowymens of confusion occur.

concentrator was formerly only provided for a Oxygen concentiators are more economical for patients requiring oxygen for bong periods, and in ingland and Wakes are now prescribable on the NHS on a regional tendering basis (see below). A patient who required oxygen for 15 lawrs a day but it has been found to be cost-effective to provide one tor a patient requiring it for 8 hours a day tor exhaders per mondit).

PRESCRIBING ARRANGAMENTS FOR OXYGEN CONCENTRATORS

bug (veb 15d smoot) pointbut taskyo to innounce (in that rate. It required, prescribe back up as gen set and cylinder at same trace, butoun patient that the supplier will be in contact to make attangements and that the prescription form is to be given to the Prescribe concentrator and accessories flace mask nasal cannolla, and humdiberr on form FP10. Specperson who installs the concentration.

litional supplier by telephone two table below) pher will send worken continuation of the order to bollow the same procedure it a back up oxygen that a concentrator has been prescribed. The supthe presentier, the patient, and the FHSA set and cylinder are required later

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micate Oxygen

to Sentand refer the patient for assessment by a respirance consistent in the need for a concentrator is continued the consultant will arrange by the provision of a trinked the consultant will arrange by the provision of a concentain though the Common Services Agency

Mucolytics

been shown to derive much benefit from them oration by reducing spotting viscosity in chronic asthma and busichity. Few patients, however, have although they do render spintum less viscid. Steam Macolytics are often prescribed to facilitate expectinhalation with persural drainage, is good expect mans therapy in broughectasts and some chronic brook lithes.

for reference to the newly introduced domase alfa, see below.

ACETYLCYSTEINE

natications: reduction of sputum viscosity

Daser adults and children over 6 years, 200 mg in water 3 times daily, usually for 5-10 days but if necessary may be extended to 6 months or binger; third inp to 2 years 200 mg daily, 2 6 years Side-effects: occasional gastro-intestinal irritation. beadache, urticaria, montus, and sensitivity 200 mg twice daily

WHS * PoM Acetylcysteine Granules (Num

Granules, weryleysteine 200 ing/sachet. Net price морчесьиза

except for abdominal copplications associated with cystic fiftiesis and endorsed [SLS] (182B) in Scotland). Note: The braind name BHS Fahrol¹⁰ (Zyma) is used for 30 sachets v £5.00 Tabel: 13 weigle) steme granules

CARBOCISTEINE

Side-effects: occasional gastro-intestitial mitation. Indications: reduction of spattern viscosity

125 mg 4 times daily, 6-12 years 250 mg 3 times Dose: 250 mg 3 times daily menally, then 4 5g darly in divided doses; critin 2-5 years 62:5-

WHS * PoM Carbocisteine Capsules (Nonproprietary

40-cap Capadra, carbocisteme 375 mg. Net price pack = C1.35

NHS * PoM Carbocisteine Syrup (No) 4 opticiary)

that liquid, carbocosteine 125 mg/5 ml., net price 000 mb. # 13 68, 250 mg/5 mt., 300 mb. # 14 72

ways and has required a tracheostomy and endorsed except, for patients under the age of 18 years, any condition which, through damage or disease, afters the air-SLS' ('S2B' in Scieland)

lene Rorer) is used for carbovisione proparations, capsides and 250 mg/5 mL, strength of syrup contain Note. The brand name MHS Mucodyne⁴⁹ (Rhone Pou-

METHYL CYSTEINE HYDROCHLORIDE

Mecysteine Hydrochloride)

reduced to 200 mg twice daily after 6 weeks: Dose: 100-200 mg 3-4 times daily before meals Prophylaxis, 100-200 mg 2-3 times every other Indications: reduction of sputum viscosity CHILD over 5 years 100 mg. 3 times daily day during winter menths

WHS Viscisin® (Sinclast)

chloride 100 mg. Net price 20 = £3.66. Label: 5. fablers, yellow, s/c, e/c, methyl cysteine hydro-

DORNASE ALFA

extracellular deuxynbonwleic acid (DNA). It is Domase alfa is a genetically engineered version of a naturally occurring human enzyme which cleaves idministered by inhalation using a jet nebuliser (see cction 3.1.5).

DORNASE ALFA

Phosphorylated glycoxylated recombinant human deoxynbonisclease I (rhDNase) Indications: management of cystic librosis patients

with a forced vital capacity (FVC) of greater than Contions: pregnancy and breast-leeding (manufactur 40% of predicted to improve pulitishary function ers do not recommend)

Side-effects: pharynguis, voice changes, larynguis, rishes, unicara

may reflect their main made of action uliser), 2800 units (2.5 mg) once daily (patients over 21 years; may benefit from twice daily disage); Dose: by inhabition of nebulised solution (by jet neb

Nebiliver solution domase alla 1000 units il mp il uit Net parce 2.5 inf. (2500 anits) vial a. 1.20-60. Note: For use undibated with jet nebulisers only, often PoM Pulmozyme[®] (Koche) some includescis are unsuitable

3.8 Aromatic inhalations

Inhabations contaming violatile substances such as encalyptus oil are traditionally weel and afthough the Vapour may contain fittle of the additive it encourages deliberate inspiration of warm more an

which is often comforting in brouchins, dealing ing. Inhalations are also used for the relief of need jánts tapplied as rubs or forpillows) as not advesed. for infants under the age of Amounts. Modice, with soung miants in whom masal obstanction with water should not be used owing to the risk of a ald CHEEREN The use of strong aromatic decourses distinction in a rife ilmatry or somethy

mueus is a pioblem can readily be tanglit appropri are techniques of suction aspuration

Benzoln Tinclure, Compound, 8P

(Friars Balsam)

not besting, water and inhale the vigent Directions by use add one teaspoontiff to a pain of hos fineture, balsamic acids approx 4 % Libel 15

encatypius oil 10 nil., light magnesium carbonaic Inhalation, cacementhal or becomental 7 g. water to 100 ml.

Directions for use, add one teaspoontof to a part of lost not bothing water and inhale the superior MAS Karvol[®] (Circules)

= 5 ž Directions for use, inhale vapon from contents of teep suff expressed into handkerchief or a part of bot not chlorbatol, pine oils, terpineol, and thymod Inhalanon capsales, mendiol 35 55 mg. price 10 = 9 lp

Cough preparations 3.9

boiling, water, avoid in infants under Amonths

Expectorant and demolectic cough-3.9.1 Cough suppressints 3.9.2

Cough suppressants preparations 3.9.1

The drawbacks of prescribing cough suppressants are rarely outweighed by the benefits of treatment pressants may cause sputum retention and this may be harmful in patients with chronic bionchitis and and only occasionally are they useful, as, for example, if sleep is disturbed by a dry cough. Cough sup-

ficiently potent to be effective in severe cough, all Opioid cough suppressants such as codeme, dextromethorphan, and photegime are seldom suf tend to cause constipation bronchiectasis.

to the public, all tend to cause diswemers which nent of many compound cough preparations on sale Sedative antihistamines, such as diplically de annue, are used as the cough suppressant compo-

citii ii under 5 years ma recommended

Oxygen is not without adverse effects. The risk of worsening hypercapnia is mentioned above. Prolonged inhalation of high concentrations of inspired oxygen may have adverse effects in both neonates and adults. In neonates it can cause retrolental fibroplasia and consequent blindness. In adults it may cause irritation of the respiratory tract, with coughing, sore throat, tracheobronchitis, pulmonary oedema, and atelectasis.

24.2 Cough

If a cough is irritating and unproductive of sputum it may be suppressed. If it is associated with production of sputum, but difficulty in expectoration, then some would use expectorant drugs. These measures are used only for the symptomatic treatment of cough, and where possible the underlying condition should also be treated.

24.2.1 Cough suppressants

Opiates act as cough suppressants by a direct effect on the medullary mechanisms subserving cough. Codeine phosphate and pholoodine can be used when a dry cough is disturbing sleep, but rarely otherwise. They may cause sputum retention, and should therefore be used with caution in chronic bronchitis or bronchiectasis. The potent opiates, such as morphine and diamorphine, may sometimes be useful in the treatment of intractable dry cough in patients with terminal illness, particularly bronchogenic carcinoma.

In addition to drugs which suppress cough directly, symptomatic relief may sometimes be obtained from a simple linetus, which feels soothing to the throat.

24.2.2 Expectorants

Various compounds have been purported to act as expectorants, but there is little evidence that any of them is of any practical value. The inhalation of steam, with or without a volatile inhalant, such as menthol or benzoin, is soothing in bronchitis and bronchiectasis, and is harmless. It may

be used as an adjunct to physiotherapy to aidexpectoration of viscid sputum.

Mucolytic expectorants supposedly act by decreasing sputum viscosity. Although they can certainly be shown to have that effect in vitro, their clinical efficacy is unproven, and they are probably no better than inhalations of steam or menthol. There is a wide variety of other expectorants available, containing drugs which supposedly increase watery bronchial secretions, but which probably act as expectorants only if they cause vomiting (for example squill, ipecacuanha, ammonium chloride). There is no evidence that any of these is of any value and they are certainly toxic:

Recently, nebulized hypertonic saline (3 mL of a 6 per cent solution) and nebulized amiloride (3 mL of a 10⁻³ molar solution) have been used as expectorants in patients with bronchiectasis and cystic fibrosis, but although they may increase the volume and water content (i.e. reduce the viscosity) of the sputum, their clinical benefit is not clear.

24.3 Pneumonias

A list of infective causes of pneumonia is given in Table 24.2, along with the first-line and alternative antibiotics indicated in such cases.

The principles of treatment of infections are outlined in Chapter 22, but the following points are worth emphasizing in regard to pneumonia.

24.3.1 Drug therapy besides antibiotics

Oxygen should be given for hypoxia. If there is severe hypoxia (P_AO_2 less than 6.5 kPa) or worsening hypercapnia, ventilation may be required. Fluids should be given if there is dehydration. Mild pleuritic pain can be relieved by analgesics such as aspirin and paracetamol, or by non-steroidal anti-inflammatory drugs such as naproxen and indomethacin. More severe pain may be treated with more potent analgesics, such as buprenorphine, morphine, or pethidine, but care must be taken in patients with hypercapnia,

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Carbocisteine

Carbocisteine was first produced in the 1930s during research into the protective nature of glutathione and cysteine against the toxicity of iodoacetate. Currently, it is used as a mucolytic agent in the adjunctive therapy of respiratory tract disorders characterized by excessive, viscous mucus.

Chemistry

Carbocisteine (carbocysteine, S-carboxymethylcysteine, Mucodyne, Mucolex)
C₄H₄NO₄S

C+011611042

S-(Carboxymethyl)-L-cysteine or 3-[(carboxymethyl)thio] alanine

Carbocisteine is a white powder with no characteristic odour.

Pharmacology

The precise mechanism of action of carbocisteine is unknown. Systems in which it is pharmacologically active are described in the section on clinical pharmacology.

Toxicology

Tests in mammalian species have revealed no significant toxicity. No mutagenic, carcinogenic or teratogenic effects have been reported.

Clinical pharmacology

Acetylcysteine decreases the viscosity of sputum by splitting the disulphide bonds of glycoprotein chains. Carbocisteine is a derivative in which the sulphydryl group is blocked by a carboxylic acid residue. It may be only partly, if at all, directly mucolytic. Its major action is thought to be on the metabolism of mucus-producing cells.1 The mucus produced under the influence of carbocisteine has an increased sialomucin content and a reduced fucomucin content. Sialomucins influence the rheological properties of mucus and may also, through inhibition of kinins, reduce or prevent bronchial inflammation and bronchospasm. This subject has been recently reviewed by Medici and Radielovic.2 In chronic bronchitis, carbocisteine has been found by some workers to reduce sputum viscosity,³ and by others to increase viscosity,⁴ A recent study⁵ examined sputum viscosity and elasticity, the latter judged by some to be the more important factor; while most patients showed reduction in both when treated with carbocisteine, two cases showed decreased viscosity with increased elasticity and one showed an increase in both. Another large study showed a trend towards increase in both viscosity and elasticity but with extremely wide variation between patients. It has been suggested that stable, predictable effects on sputum are not seen until after at least seven, possibly fourteen, days of treatment.

Carbocisteine has been shown to increase the forced expiratory volume in one second but another study showed no such effect.

Corposisteme, has been demonstrated to have no effectional degrance of long of tractions secretions.

Studies of the use of carbonsteine of patients with forms means with effusion have furiously reported benefit. It has been observed that carbonsteine does not influence the viscosity, of established effusion but, given preoperatively and postoperatively favourably influences the outcome after surgical removal of the effusion, this is said to reflect the influence of carbonsteine on mucus-producing cells.

Pharmacokinetics

Published studies have employed a variety of methods for determining carbocisteine in biological fluids. These have included separation of the intact compound using an amino acid analyser, gas liquic chromatography (GLC) using trifluoroacetic anhydride derivatization with flame-ionization detection, and GLC with a flame photometric detector in the sulphur mode. (3–13

Curbocisteine is promptly absorbed after oral administration and the kinetics fit a one-compartment open model. Peak concentration is reached at 1.09 hours for syrup preparations and 1.70 hours for capsules: peak concentrations after a 1.5 g dose are 13.38 and 12.40 mg.l⁻¹ respectively. The plasma half life is estimated at 1.3 hours. The apparent volume of distribution is 60.41.18 There is no information on intravenous studies to allow bioavailability determination. There is no reported work on first-pass metabolism or proteinding.

Studies using the lysine salt of carbocisteine have shown that up to 17.5% of an oral dose penetrates bronchial mucus. Peak concentration in mucus is at 2.0 hours and half life is 1.82 hours. ¹⁴ In mice an guinea-pigs, the highest concentration of carbocisteine (after oral administration) occurs in liver, kidney, pancreas, spleen and lung Very little is found in brain. Levels are best maintained in lung tissue. ¹⁶

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Oral absorption	extensive			·
Presystemic metabolism	<u>*</u>		• •	
Plasma half life	<u>€</u> 9			. 1
mean	-⊲1:33 h			4
Volume of distribution	60.41			
Plasma protein binding				

Concentration-effect relationship

There are no data to suggest a relevant relationship between conceptration and effect.

Metabolism

Using ¹⁵S-labelled carbocisteine it has been observed that only 0.3 appears in faeces over a three-day period after a single oral dose. A the rest is excreted in the urine. Much of it is excreted unchange but with wide individual variation (range 29-83%). There similar, wide variation in the pattern of metabolism, the majorathways in man being acetylation, decarboxylation and sulphoxidation. Two out of three individuals excrete a glucuronic acid conjuga as a minor metabolite. There are no reports of pharmacologically important activity in these metabolites. There is evidence the the sulphoxidation of carbocisteine is under monogenic control.

Pharmaceutics

Carbocisteine is available in the UK in a number of oral forms:

- Mucodyne capsules (Rorer, UK): opaque, yellow capsules marked 'Mucodyne 375' (Rorer, UK) each containing carbocisteine 375 mg. Also as Mucolex (Warner, UK) round convex orange tablets.
- Mucodyne syrup (Rorer, UK): clear amber syrup containing 250 mg carbocisteine in 5 ml; also as Mucolex syrup (Parke-Davis, UK) with a raspberry-menthol flavour.
- Mucodyne syrup forte; opaque, orange syrup containing 750 n carbocisteine in 5 ml.
- Mucodyne paediatric: clear, red syrup containing 125 mg carbocisteine in 5 ml.

All problems of Sylvesia halph socialization in light and not Nunlected to temperatures, appeared 25 C.s. The surphy langue diluted with appreserved syrup BP hat should be kept for only 14 days thereafter Mixture of the syrup with photoadene lineral causes precipitation of the gaphocisteine.

Therapeutic use

Indications.

The approved andicationalis as an adjunctive therapy for those respiratory tractidiscraers characterized by excessive and or viscous madus, including after-ear in unitarion.

Contraindications 44

There are no contraindications (see Concurrent disease).

Mode of use

In adults the initial daily dose is 2250 mg in divided doses, reducing to 1500 mg when a satisfactory clinical response has been obtained. In children the normal daily dose is 20 mg/kg⁻¹ body weight in divided doses, given as paediatric syrup. For children aged 2-5 years, 2.5-5 ml four times a day; 5-12 years, 10 ml three times a day. There is no recommended schedule for children under 2 years. The manufacturers do not suggest how long treatment should be continued, though it may take at least seven days before an effect is seen.*

Indications

The place of carbocisteine in clinical practice has not been firmly established and the case for its use is 'not proven'. This is reflected in its no longer being available on a British National Health Service prescription—except for patients under the age of 18 years who have airways disease or damage which has required tracheostomy.

Adverse reactions

Potentially life-threatening effects

There are no reports of such effects with carbocisteine and no reports sof death associated with its use.

Acute overdosage

Gastrointestinal disturbance is the only likely symptom and no active treatment is necessary.

Severe or irreversible adverse effects

The very few suspected reactions associated with carbocisteine therapy reported to the Committee on Safety of Medicines include gastrointestinal bleeding and convulsions, but a causal relationship has not been established.

Symptomatic adverse effects

These are very rare (only 22 reports to the Committee on Safety of Medicines between 1964 and 1984). Reported reactions are skin rashes, nausea, headaches, myalgia, dizziness, urinary incontinence, palpitations, dyspnoea and minor psychiatric disturbance.

Other effects

In one trial a significant fall in blood sugar was reported, though values remained close to normal and no symptoms of hypoglycaemia occurred.

Fig. 1 Metabolism of carbocisteine

Carbodisteine

Interference with clinical pathology tests

Serrences need and encide

High risk groups

Neunates:

There is also information on the use of furbocisteine in admittes with infunts and no recommended dosage schedule.

ng Breast milk. There is industrial mattern on the use of cachers less during the control of the cachers less than the cacher less than the cachers less than the cacher less than the

Pregnant women

While there are no reports of teratogenic effects, the manufacturers do not recommend the use of carbonisteine in the first trimester.

The elderly

Many reported trials have included elderly patients and no special problems have arisen.

Concurrent disease

No special precautions are recommended by the manufacturer, but it would seem sensible to avoid carbocisteine in patients with recent gastrointestinal bleeding.

Drug interactions

Neither hazardous nor therapeutically useful interactions have been reported.

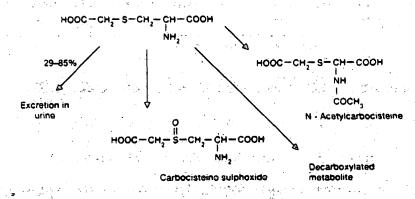
Major outcome trials

- Edwards G F, Steel A E: Scott J K: Jordan J W 1976 S-carboxymethylcysteine in the fluidification of sputum and treatment of chronic airway obstruction. Chest 70::506-513.
- A double-blind, controlled trial of 82 patients with mild chronic bronchitis given carbocisteine 3 g daily for three months reported increased sputum volume, reduced sputum viscosity and improved lung volume.
- 2. Puchelle E. Aug F. Polu J M 1978 Effect of muco-regulator S-carboxymethylcysteine in patients with chronic bronchitis. European Journal of Clinical Pharmacology 14: 177-184
- A double-blind study of 20 patients with chronic bronchitis given carbocisteine 3 g daily for 2 weeks reported improvement in cough, ease of expectoration and ausculatory findings, but with an increase in sputum viscosity and no change in lung volumes.

The variation in reported effects of carbocisteine in chronic bronchitis and otitis media has been detailed in the section on clinical pharmacology.

References

- 1. Havez R. Degand P. Roussel P. Randoux A 1970 Mode d'action biochemique des derives de la cysteine sur le mucus bronchique. Poumon Coeur 26: 81-90
- Medici T C. Radielovic P 1979 Effects of drugs on mucus glycoproteins and water in bronchial secretion. Journal of International Medical Research 7:
- Edwards G F, Steel A E, Scott J K, Jordan T W 1976 S-curboxymethyleysteine in the fluidification of sputum and treatment of chronic airway obstruction. Chest 70: 506-513
- Puchelle E. Aug F. Polu J M 1978 Effect of muco-regulator
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 Clinical Pharmacology 14: 177-184



MEDICINES CONTROL AGENCY ANROLO

ADVERSE DRUG REACTIONS ONLINE INFORMATION TRACKING DRUG ANALYSIS PRINT

EXTRACTED FOR PERIOD: 01/07/63 - 06/10/95 EARLIEST REACTION DATE: 20/04/73 REACTION: ALL OKIGIN: UK

DRUG : CARBOCISTEINE ROUTE: ALL SUBSTANCE/VARIANT/NEG SUBS

SINGLE-CONSTITUENT PRODS : NONE

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CRITERIA FOR CLASSIFYING MEDICINAL PRODUCTS AS PRESCRIPTION-ONLY MEDICINES.

(Directive 92/26/EEC and Section 58A of The Medicines Act 1968)

- Prescription control is applied to any product which
- is likely to present a direct or indirect danger to human health, even when used correctly, if used without the supervision of a doctor or dentist; or
- is frequently and to a very wide extent used incorrectly, and as a result is likely to present a direct or indirect danger to human health; or
- contain substances or preparations of substances of which the activity requires, or the side effects require, further investigation; or
- is normally prescribed by a doctor or dentist for parenteral administration.
- 2. In deciding whether the above apply, account should be taken of whether the product
 - (a) contains a substance which is listed in any of Schedules I,II or IV to the Narcotic Drugs Convention (where the product is not a preparation listed in Schedule III to that Convention): or
 - (b) contains a substance which is listed in any of Schedules I, II or IV of the Psychotropic Substances Convention (where the product is not a preparation which may be exempted from measures of control in accordance with paragraphs 2 and 3 of article 3 of that Convention): or
 - (c) is likely, if incorrectly used-
 - (i) to present a substantial risk of medicinal abuse, or
 - (ii) to lead to addiction, or :
 - (iii) to be used for illegal purposes: or
 - (d) contains a substance which, by reason of its novelty or properties, might fall within paragraph (c) above but as to which there is insufficient information available to determine whether it does so fall: or
 - (e) by reason of its pharmaceutical characteristics or novelty, or in the interests of public health, is reserved for treatments which can only be followed in a hospital: or
 - (f) is used in the treatment of conditions which must be diagnosed in a hospital or in an institution with special diagnostic facilities (although administration and subsequent supervision may be carried out elsewhere): or
 - (g) is intended for outpatients but may produce very serious side-effects which would require a prescription drawn up as required by a specialist and special supervision throughout the treatment.
- Exemptions from prescription control may be made having regard to-
 - (a) the maximum single dose;
 - (b) the maximum daily dose;
 - (c) the strength of the product;
 - (d) its pharmaceutical form;
 - (e) its packaging; or
 - (f) such other circumstances relating to its use as may be specified in the determination.

Aide-memoir on making POM to P Switches

- In January 1993, the Medicines Act was amended to include the criteria for prescription control as laid down in Council Directive 92/26/EEC which states that medicinal products shall be classified as prescription-only medicines where they
 - are likely to present a danger either directly or indirectly, even when used correctly, if utilized without medical supervision, or
 - are frequently and to a very wide extent used incorrectly, and as a result are likely to present a direct or indirect danger to human health, or
 - contain substances or preparations thereof the activity and/or side effects or which require further investigation, or
 - are normally prescribed by a doctor to be administered parenterally.
- 2. To confirm that a drug/product is suitable for switching from POM to P, the following should all apply:
 - the indication(s) for the drug/product must be suitable for self medication including self diagnosis of the condition which may be a recurrent attack of a condition which required a physician-aided diagnosis on first attack,
 - in the doses recommended, the drug/product has an acceptable margin of safety during unsupervised use including safety in overdose or following accidental misdiagnosis of the condition by the patient,
 - the drug/product is not a new chemical entity for which further postmarketing experience of safety is considered desirable,
 - the drug/product does not present a hazard to the community (i.e. indirect danger) from unsupervised use as might occur with the development of resistant flora to antibiotics
 - the drug/product has no major abuse or dependence potential
 - the drug product is not for parenteral use.
- The refusal of a request for reclassification from POM to P requires the applicant to be informed as to which of the POM criteria still apply.