FOI 23/601

Dear

Thank you for your email and we apologise for delay.

Please find below answers to the questions you have raised below.

1. ***For each calendar year from 2013 to 2022 inclusive please state how many Fatal SUSARS were reported to you and how many life threatening SUSARS were reported to you in relations to drug trials.***

Response:
The tabulated data below states the number of fatal and life-threatening SUSARs occurring in UK trial sites reported for each calendar year from 2013 to 2022:

	SUSARs	
Year	**Fatal**	**Life-threatening**
2013	170	90
2014	107	89
2015	162	139
2016	405	106
2017	154	93
2018	176	162
2019	146	194
2020	126	131
2021	140	160
2022	108	122

2. ***For the combined ten years of data please supply a league table showing the top ten drugs that were associated with all types of fatal or life threatening SUSARS in relation to drug trials? Please provide the name of the drug and then the total number of these SUSARS.***

The requested league table below presents the top ten study drugs or, investigational medicinal products (IMPs), with a causal relationship to fatal or life-threatening SUSARs reported in the combined ten-year period of 2013 to 2022. Figures show the number of SUSARs occurring in UK trial sites only.

Please note:

- Generally, SUSAR reports are based on the requirement to report specific events to the regulatory agencies, ethics committees, and investigators. As such, they capture a small fraction of serious and related events that have not yet been observed at a certain frequency in the clinical trials. Therefore, the report of a SUSAR does not always equate to a potential safety signal, as some adverse events may be anticipated to occur based on the established

safety profile of the investigational drug. In addition, SUSARs are reported on an individual basis. An overall causal relationship with a product cannot be reliably established based on individual cases and is based on the comprehensive evaluation of all of the safety data from a study. The number of SUSARs alone does not represent the confirmed safety profile of the drug but should be placed in the context of the full benefit-risk profile of the associated indications studied in clinical trials and the associated number of patients treated with the products. Because clinical trials are conducted under widely varying conditions, adverse events observed in the clinical trials of a drug cannot be directly compared to that of another drug

- A listing of SUSARs by product does not reflect the patient population being studied, the indications, or the combinations that are used in the actual studies from which this data was derived.

Please note that most of the study drugs listed are investigated for the treatment of oncology conditions, and these study participants often have life-threatening complications, disease progression, and/or fatal outcomes related to the condition under treatment. Moreover, depending on the disease under study, oncological trials are often conducted in an elderly patient population, which typically has pre-existing comorbidities that increase the risk for severe or fatal complications in general, but also for any antineoplastic therapy.

Investigational Medicinal Product (IMP)	SUSARs reported
CYCLOPHOSPHAMIDE MONOHYDRATE	380
FLUDARABINE PHOSPHATE	290
RITUXIMAB	192
LENALIDOMIDE	177
GEMTUZUMAB OZOGAMICIN	115
CISPLATIN	95
GEMCITABINE HYDROCHLORIDE	92
CAPECITABINE	90

PEMBROLIZUMAB	83
IBRUTINIB	75

If you are dissatisfied with the handling of your request, you have the right to ask for an internal review. Internal review requests should be submitted within two months of the date you receive this response and addressed to: info@mhra.gov.uk"
Please remember to quote the reference number above in any future communications.

If you were to remain dissatisfied with the outcome of the internal review, you would have the right to apply directly to the Information Commissioner for a decision. Please bear in mind that the Information Commissioner will not normally review our handling of your request unless you have first contacted us to conduct an internal review. The Information Commissioner can be contacted at:
Information Commissioner's Office
Wycliffe House
Water Lane
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Yours sincerely
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