NOVOLIZER[®] BUDESONIDE

Corticosteroids for the treatment of chronic asthma in adults and children aged 12 years and over

Response to the assessment report produced by the Peninsula Technology Assessment group and Southampton Health Technology Assessments Centre

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Meda Pharmaceuticals Ltd

Having had the opportunity to review the assessment report, *ICS and LABAs for the treatment of chronic asthma in adults and children aged 12 years and over: Systematic review and economic analysis*, carried out on behalf of NICE, we would like to draw the Appraisal Committee's attention to the following points regarding Novolizer[®] Budesonide (Meda Pharmaceuticals Ltd, UK).

Choice of inhaler device

The current assessment report concludes that there is no clinical difference, and very little cost difference, between the various inhaled corticosteroids (ICSs). However, it does not discuss the clinically important effects of correct use of inhaler devices; these should be considered by the report if it is to be of real use to the practising clinician and could be incorporated into Table 2 on page 18.

While we would argue with some of the cost outcomes presented in the report, we believe that simple, correct and auditable device use is the single most important discriminator between the ICSs in the absence of any efficacy differences at appropriate comparative doses. The studies currently cited will only include patients with good inhaler technique and are therefore likely to produce optimum efficacy. Poor inhaler technique is universally accepted to be associated with less than optimum efficacy, irrespective of the steroid used. On page 15, it is accepted that the choice of inhaler device is 'potentially important in the decision as to which ICS might be best suited to an individual'. This is a significant underestimate of the importance of device technique. The assessors then dismiss device technique on the grounds that 'the comparison of inhaler devices is beyond the scope of this appraisal'. However, the Novolizer is only slightly more expensive than the cheapest chlorofluorocarbon (CFC)-propelled beclometasone dipropionate (BDP) product (see Figures 26 and 28; pages 390 and 393), so it ought to be stated that the advantages of such an advanced inhaler could outweigh the small additional cost over BDP and that all factors including inhaler technique, individual preference and so on should be taken into account.

Indeed, section 3.4.1.3 (page 15) clearly states that 'correct use of an inhaler is essential'. The Novolizer has a trigger mechanism that ensures that the dry powder is

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not released until sufficient inhalation is generated to provide a good lung deposition. The low internal resistance of the Novolizer device makes it easier to generate this modest triggering flow, ensuring that the inhaler is used correctly. In addition, and uniquely among inhalers in current use, the Novolizer then visually confirms that the dose has been taken at the necessary inspiratory flow. This absolute confirmation of dosing can then be checked by the patient, the patient's carer/parent and the clinician.

The clinical benefits of the Novolizer device are summarised below.

Benefits of the Novolizer device

Currently available inhaler devices do not fulfil the characteristics sought in an ideal inhaler. The Novolizer device has the following benefits to patients and should improve compliance.

- The Novolizer has low intrinsic airflow resistance; therefore, the elderly, children and patients with severe lung disease will be able to activate the device.
- There are multiple feedback mechanisms confirming correct dosing (visual, acoustic and taste).
- The Novolizer has one of the highest lung deposition values obtained for drypowder inhalers (DPIs). Correct inhaler technique and good lung deposition ensure consistent maximum efficacy of an inhaled steroid.
- In randomised, controlled trials, the Novolizer has demonstrated therapeutic equivalence to established treatments for asthma.

No deep inhalation required

Page 15 of the assessment report states:

Dry powder inhalers (DPIs) require less co-ordination by an individual in order to achieve correct inhaler technique. However, lung deposition is flow-dependent requiring a forceful, deep inhalation to correctly trigger the device. This is not correct – a deep inhalation is not required for more advanced devices such as the Novolizer. The Novolizer can be triggered by a breath of 35 l/min and indeed has been used successfully in children as young as five years.

Pulmonary bioavailiability

Table 2 on page 18 should state that the pulmonary bioavailability of the Novolizer device is at least 22% of the nominal dose and can be higher depending on the depth of inhalation.

Economic analyses – ICS versus ICS

Page xx of the Executive Summary of the assessment report states: At daily doses of 400 μ g per day BDP-CFC propelled devices are currently the cheapest available, and remain so but at a higher annual cost if CFC-propelled products are excluded from the analyses.

At 800 μ g/day and 1500-1600 μ g/day BDP-CFC propelled products remain the cheapest available. At these doses if CFC-propelled products are excluded then FP products can be on average the cheapest ICS product available if the mean is weighted by market share.

This does not take into account the cost-effectiveness of inhaled corticosteroid (ICS) products – the multiple feedback mechanisms, low intrinsic airflow resistance and high lung deposition values of the Novolizer device should be mentioned.

Page xx also states:

The use of weighted averages to represent the cost associated with each ICS tends to conceal the wide variations in costs between the individual preparations of each drug, and the wide overlap in costs between the drugs.

Therefore, the least expensive products in each category should be mentioned. If not, it would be useful to point the reader to the detail on the least expensive individual drugs, which can be found in section 6.5.3.1, beginning on page 387. In particular, the

Novolizer, with its advanced inhaler technology, is only slightly more expensive than the cheapest CFC-propelled BDP product.

In Figures 26 and 28 (pages 390 and 393), it should be noted that some of the cost differences between the least expensive products in the BDP, budesonide (BUD) and fluticasone propionate (FP) categories are minimal. Therefore, it is essential to consider patient preference, inhaler technique, lung deposition and so on when choosing between them.

Conclusion

In a therapeutic area where this report clearly demonstrates little difference in the efficacy of the products compared, the practical ability of the patient to use the inhaler – and that of the patient/carer/clinician to check it has been used correctly – remains the key discriminator between the products. It has long been clinically accepted that breath-actuated inhaler systems are better for patients but in the past, this usually came at a significant cost. The Novolizer is less expensive than most BDP and FP products and offers more clinically important patient benefits than any other current breath-actuated inhaler.