

29th March 2010

Health Technology Appraisal

Psoriatic arthritis - etanercept, infliximab & adalimumab (review)

Pfizer response to the Appraisal Consultation Document (ACD)

Pfizer is pleased that the Appraisal Committee (AC) after due consideration of the evidence submitted and the views of the manufacturer consultees, commentators, clinical and patient experts has produced a positive preliminary recommendation for etanercept for the treatment of psoriatic arthritis.

In particular, we welcome the AC comments in Section 4.3.3 on p22 that etanercept is a clinically effective treatment for psoriatic arthritis

“The Committee considered the clinical effectiveness data presented by the manufacturers and noted that etanercept, infliximab and adalimumab all showed a statistically significant response in the joint disease (PsARC, ACR) and skin disease (PAS) at 12- and 24- week follow-up compared with placebo.”

Pfizer also welcomes the AC conclusions in Section 4.3.10, p26 that etanercept represents a cost-effective treatment for psoriatic arthritis.

“..the Committee considered that the evidence on clinical and cost-effectiveness for etanercept and adalimumab was not sufficient to allow a choice to be made between one drug over the other, and was aware that they both represented a cost-effective use of NHS resources, with equivalent acquisition and administration costs. The Committee considered that the criteria for recommending etanercept (in NICE technology appraisal guidance 104) and adalimumab (in NICE technology appraisal guidance 125) remained valid.”

Overall, Pfizer agrees that all the relevant evidence for etanercept has been taken into account and that the summaries of the clinical and cost effectiveness for etanercept have been interpreted in an appropriate manner within the ACD with the result that the provisional recommendations are sound and a suitable basis for guidance to the NHS.

However, we have two comments relating to the ACD. The first relates to the statement included in Section 4.1.2 of the ACD that data for etanercept on PASO at week 12 were available from the MEASE 2000 trial only. This is not correct as we included in our submission pooled data from Mease 2000 and Mease 2004. Please see attached table of the pooled results.

The second comment relates to the statement included in Section 3.4, p6 of the ACD stating that the manufacturer of Infliximab is Wyeth Pharmaceuticals. This statement is not correct as Infliximab is manufactured by Schering Plough.