

Botulinum toxin type A for the prevention of headaches in adults with chronic migraine

Comment on appraisal consultation document

Location in consultation document	What the consultation document says	Our comment
Page 5, para 2.1	Botulinum toxin type A (Botox, Allergan) is a purified neurotoxin complex which produces seven neurotoxins that are structurally similar but immunologically distinct. It has neuromuscular transmitter blocking effects.	<p>Please check this description. Section 5.1 of the summary of product characteristics states:</p> <p>The active constituent in BOTOX is a protein complex derived from <i>Clostridium botulinum</i>. The protein consists of type A neurotoxin and several other proteins. Under physiological conditions it is presumed that the complex dissociates and releases the pure neurotoxin.</p> <p><i>Clostridium botulinum</i> toxin type A neurotoxin complex blocks peripheral acetylcholine release at presynaptic cholinergic nerve terminals.</p>
Page 5, para 2.2	The summary of product characteristics lists the following <u>adverse reactions</u> that may be associated with botulinum toxin type A treatment: blepharospasm, cervical dystonia, paediatric cerebral palsy, primary hyperhidrosis of the axillae and focal spasticity of the upper limb associated with stroke.	<p>The conditions listed (blepharospasm, cervical dystonia, etc) are in fact indications for botulinum toxin type A, <i>not</i> adverse reactions.</p> <p>Also, we suggest that the wording of therapeutic indications should closely match that in the summary of product characteristics. For example, the summary of product characteristics states 'dynamic equinus foot deformity due to spasticity in ambulant paediatric cerebral palsy patients' rather than just 'paediatric cerebral palsy'.</p>

Comment on evaluation report

Location in evaluation report	What the evaluation report says	Our comment
Page 399, para 3 in first panel	Botox is currently given in various NHS hospitals by Neurologists for dystonia, spasticity; by Dermatologists and Plastic Surgeons for hyperhidrosis and cosmetic reason;	While the product might be used for cosmetic purposes, Botox is not specifically licensed for such use
Page 447, para 3	Other approved indications have included cervical dystonia, axillary hyperhidrosis (excessive sweating from the armpits) and cosmetic use, such as removing frown lines from the forehead.	The UK summary of product characteristics for Botox is more restrictive than suggested here; the approved indication is: 'temporary improvement in the appearance of moderate to severe vertical lines between the eyebrows seen at frown (glabellar lines), in adults <65 years old, when the severity of these lines has an important psychological impact for the patient'
Page 504, para 1	Aurora argued that the injections sites and doses for Botox in PREEMPT differed from those used for cosmetic purposes.	Botox is not licensed for cosmetic use as such. The licensed indication is: 'temporary improvement in the appearance of moderate to severe vertical lines between the eyebrows seen at frown (glabellar lines), in adults <65 years old, when the severity of these lines has an important psychological impact for the patient'