DEMONSTRATION OF EFFICACY OF ECTOPARASITICIDES

Guideline Title: Demonstration of Efficacy of Ectoparasiticides
Legislative Basis: Directive 81/852/EEC as amended
Date of First Adoption: prior to September 1994
Date of Entry into Force: prior to September 1994
Status: Last revised September 1994
Previous Titles: None
Additional Notes:
The objective of this document is to provide specific guidance in respect of the documentation of the efficacy of ectoparasiticides. It should be read in conjunction with Directive 81/852/EEC as amended, and the note for guidance on Good Clinical Practice for the Conduct of Clinical Trials on Veterinary Medicinal Products in the European Union.

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DEMONSTRATION OF EFFICACY OF ECTOPARASITICIDES

1 INTRODUCTION

This note for guidance deals with general requirements for the assessment of efficacy of an ectoparasiticide preparation, containing novel or established active ingredients.

It is the purpose of treatment with ectoparasiticides to eliminate or to reduce arthropod parasites or to protect animals from them, in order to maintain animal health and to prevent losses in production.

Ectoparasiticides intended for external or internal use will have to fulfil all the usual requirements of approval of veterinary medicinal products.

This note is intended to provide special guidance in respect of the documentation of the efficacy of ectoparasiticides and should be read together with Directive 81/852/EEC as amended and the note for guidance: Good Clinical Practice for the Conduct of Clinical Trials on Veterinary Medicinal Products in the European Union.

Where a claim for control of infestation is made, the period of time it takes to achieve control and the period over which control is achieved must be demonstrated.

At the end of the time period as indicated by the applicant, the overall efficacy of ectoparasiticides in treating infections in domestic animals should be achieved as follows:

- for fleas: approximately 100%
- for lice: approximately 100%
- for mites: approximately 100% for Sarcoptes scabiei and, if possible, more than 90% for other mange mites
- for ticks: more than 90%
- for diptera: 80-100% (preferably more than 90%)
- for larval arthropods: 80-100% (preferably more than 90%)

Where indicated and justified, clinical parameters may be used to support the efficacy of a product.

Where efficacy is less than the above no claim should be made unless the applicant can demonstrate that the degree of efficacy achieved is better than or comparable with current alternatives.

All claims for efficacy of the product against particular species of ectoparasites must be validated. While in principle, the results of dose titration and dose confirmation trials should be acceptable irrespective of where they are carried out, the competent authority of a Member State may require additional clinical field trials to be undertaken where scientifically justified for the assessment of efficacy of the product, e.g. where normal husbandry or environmental conditions differ markedly from reported test conditions.
In the design of efficacy studies, the following must be taken into account:

- the kind of effect(s) exerted by the active ingredient(s) (e.g. flushing out, repellent, killing, anti-feeding or detaching effect, insect growth regulating effect, larvicidal, ovicidal, adulticidal or pupicidal effect);
- occurrence and susceptibility of ectoparasites in different geographic and climatic regions;
- control of ectoparasite-related diseases if indicated;
- safety of the target animal;
- pharmacokinetic behaviour of the substance under investigation;
- data on drug resistance of ectoparasite species, where available;
- products intended for the treatment of ectoparasitic conditions may affect the environment, etc. Due regard should be given to legislation in respect of operator, consumer and environmental safety.

For fixed combination products containing two or more active ingredients, it will be necessary to assess the potential advantages in the control of ectoparasites against possible disadvantages (e.g. synergistic or additive actions; antagonism; substitution of effects; non-effect (overkill)), taking into account the note for guidance on Fixed Combination Products.

2. GENERAL REQUIREMENTS

To establish the clinical efficacy of an ectoparasitic product, the following test phases are recommended:

- description of the mode of action
- titration of dose
- dose confirmation trials
- clinical field trials

The test phases will usually be based on the results of preliminary in vitro studies using the target ectoparasite(s) claimed, i.e. studies on the potential spectrum of activity and the prospective dose.

2.1 Mode of action

a) The pharmacodynamics of the active ingredient(s) on the target ectoparasite(s) should be adequately described in terms of the sequence, speed and intensity of the various effects; replicates should be included. Approximate effective concentrations should be indicated.

b) Where applicable, the influence of temperature on the efficacy of the product should be evaluated.

c) Where applicable, the influence of excipients should be described.

d) In evaluating the results of in vitro tests, the ABBOT formula should preferably be used, i.e. if the mortality rate of untreated control arthropods exceeds 20%, the test results cannot be utilised in the assessment of efficacy of the proposed product.
e) The pharmacokinetics and pharmacodynamics of the product in the target animal species should be described, whenever it is applicable.

2.2 Titration of dose

a) The purpose of the trials is a determination of the effective dose to be recommended. Ideally the final formulation should be used in these trials. In exceptional cases, where justified, an equivalent formulation may be used.

b) The efficacy of the product should be evaluated using appropriate tests. A use of the controlled test is recommended (see Annex I).

c) The parasite species chosen for titration of dose studies should be evaluated in relation to the indications for the product. Naturally infested or, where applicable, artificially infested animals can be used.

d) Ideally, four groups, each consisting of a sufficient number of animals to allow statistical analysis, should be administered 0, 0.5, 1 and 2 times the anticipated recommended dose. Each group should harbour or be uniformly infested with adequate numbers of each species of ectoparasites. Single or mixed infestation may be used.

e) Groups should be held under the same experimental conditions. Husbandry practices should be described.

f) The route and technique of administration should be the same as proposed for marketing.

g) The time intervals for ectoparasite counts should be justified, especially with regard to the biology of the ectoparasite(s).

h) Data obtained for each ectoparasite at the recommended dose in the dose titration trial(s) will be acceptable as one of the dose confirmation trials provided that:

- the formulation used was equivalent to the formulation intended for marketing,
- the product was applied according to the labelling,
- adequate infestation of ectoparasite species was established,
- the number of test animals was adequate.

i) Product for topical use, e.g. exhibiting a direct knock-down, repellent or killing effect (non-systemic action): The evaluation of the anticipated recommended dose or concentration can be based, where applicable, on the results of appropriate preclinical tests including in vitro tests using isolated ectoparasite species indicated in the labelling (ED$_{50}$, ED$_{90}$, ED$_{95}$, ED$_{99}$, EC$_{50}$, EC$_{90}$, EC$_{95}$, EC$_{99}$ etc.).

2.3 Dose confirmation trials

a) At least two controlled tests are recommended to demonstrate the efficacy of a new product against each ectoparasite species and stage of development as indicated in the labelling.

b) Where applicable, trials should be performed in different geographic and climatic regions.

c) Where applicable, at least one trial should be performed using naturally infested animals.
d) Statistically adequate numbers of treated and control animals are necessary for each trial. The applicant must justify treatment group sizes.

e) Trials should be conducted using the formulation intended for marketing and using the recommended dose and administration techniques.

f) When efficacy is claimed for parasites in which resistant strains have emerged and the product is likely to be used in animals exposed to resistant strains, a controlled trial using recognised scientific techniques will be necessary to establish efficacy, if the new active ingredient has:
   - a similar mode of action to that of the existing ectoparasiticide
   - a close chemical analogy to that of the existing ectoparasiticide.

2.4 Clinical field trials

a) Clinical field trials are required primarily for follow-up evaluation of the performance of the product as employed by the user in the field and to gain experience on the efficacy and safety of the product when applied under various clinical conditions.

b) Field trials should be conducted in at least 2 different geographic and climatic regions, where appropriate. The habitats and the prevalence of ectoparasite species must be described.

c) The competent authority may require additional regional field trials depending on husbandry practices, environmental conditions and resistance profile of ectoparasites where scientifically justified.

d) Data on a sufficient number of treated animals are required. When treatment of groups is intended, preferably 25-50% of the groups under trial should be left untreated. Where this cannot be justified, 25-50% of the groups should be treated with a product established according to Directive 81/852/EEC which is indicated for control of the ectoparasite or groups of ectoparasites claimed. In exceptional cases, where justified, studies may be performed without the use of control animals (e.g. in the case of animals infected with Sarcoptes scabiei). When treatment of individual animals is intended, more specifically small companion animals, studies without the use of control may be performed if justified.

e) Efficacy may be determined by counting of ectoparasites on the animal, or, where this is not possible, by estimation (e.g. fleas). The choice of sampling times should be justified, e.g. in respect to the seasonal or daily time of a maximum infestation with ectoparasites, taking into account sites of predilection of the arthropods. To minimise variations in the response, clinical trials should preferably be performed in animals of the same breed. However, efficacy must be demonstrated in different breeds representing the target population. All procedures should be described and validated or should be based on published methods which must be cited. The investigator should use the same technique throughout the trial.

f) Where applicable, groups of treated and control animals should be established by random selection.

g) Parasite related diseases should be described before initiation of treatment and the regression of clinical symptoms and the cure of diseases, respectively should be monitored during the study period.
h) A statistical analysis of the results of each trial as well as the overall efficacy of the product should be conducted, where appropriate, for each arthropod species claimed.

i) The animals under trial should be observed at appropriate intervals during and after treatment, to record all adverse reactions and side effects.

3. SPECIAL REQUIREMENTS

3.1 Products for topical use
Products for topical use include shampoos, aerosols, spot-on, pour-on or dust formulations, ear tags, collars, clips, dipping or spray-race formulations, etc.

While the general requirements also apply to products for topical use, it is necessary to take into account interactions between treatment and regional climatic conditions during the course of the trial. In particular, the applicant should consider the need for additional studies as follows:

a) the effect of (artificial) rainfall at various intervals before, during and after treatment;

b) the effect of sunshine and hot weather under monitored conditions during and after treatment;

c) the effect of dilution factors with dipping;

d) the effect of washing and bathing during the treatment period;

e) the effects of hair length and thickness of coat;

f) the effect of dirtiness of animal coat and the effect of dirtying of preparations (e.g. of dipping formulations) during the treatment of groups;

g) the effect of self-grooming or mutual grooming of treated animals;

h) different body sizes of target animals treated with a standard dose formulation;

i) effects on the quality of fleece or hide and impact on tanning or processing.

Ideally, side effects and adverse effects of the product should be monitored during the trial and for several days afterwards. Where secondary pharmacodynamic effects are seen, a study on the dose/effect relationship may be required.

3.2 Insecticide-delivery systems (e.g. collars, ear tags etc.)

a) If the applicant claims that the product will be effective for a seasonal period of pest activity, then the trial must be conducted over the entire season.

b) Evaluation will be based on efficacy in controlling infestation with pests at the time stated by comparison with control animals, where relevant.

c) Controls and treated animals should occupy separate lots within the same area throughout the trial. Groups of animals should be maintained under such conditions to guarantee comparable parasite loads, but exclude interference between treatments and controls.
ANNEX 1

The Controlled Test

1. The efficacy of an ectoparasiticide can be determined by comparing the number of ectoparasites in the control animals with the number of ectoparasites in the treated animals after a suitable post treatment interval.

2. The population of infested animals should be randomly separated into at least two groups. The method of separating animals into groups must be described and justified. The first group serves as a control group while the other group(s) should be treated with the test product. After suitable time interval(s), ectoparasites should be recovered, identified and quantified with an appropriate method, where possible.

3. When a controlled field trial against temporarily infesting ectoparasite species is indicated, the population of animals should be randomly separated into two groups and placed on similar pastures. Groups of animals should be maintained under such conditions to guarantee comparable parasite loads, but exclude interference between treated animals and controls. Before start of treatment, it must be ensured that the ectoparasite burden is comparable in both control and treatment groups.

4. The percentage efficacy for each species of ectoparasites is determined by comparing the treated group and control group using the following formula:

   \[ \text{% efficacy} = \left( \frac{C - T}{C} \right) \times 100 \]

   Where \( C \) = mean of the controlled group.
   \( T \) = mean of the treated group.

5. The mean may be the arithmetic mean, the geometric (i.e. logarithmic) mean or other suitably transformed mean. However, such transformation must be justified.

6. Results must be statistically analysed and, where possible, confidence limits of the means should be given. The statistical method used must be justified.