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3 Committee for Medicinal Products for Human Use (CHMP)

4 **Concept paper on clinical investigation of medicinal**
5 **products for the treatment of Axial Spondyloarthritis**
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Comments should be provided using this [template](#). The completed comments form should be sent to RIWPsecretariat@ema.europa.eu

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28 1. Introduction

29 *Classification and epidemiology*

30 The concept of spondyloarthritis (SpA) includes ankylosing spondylitis (AS), psoriatic arthritis,
31 arthritis/spondylitis with inflammatory bowel disease, reactive arthritis, as well as undifferentiated
32 SpA. All of these can present with a predominantly peripheral or axial subtype. In 2009 ASAS
33 (Assessment in SpondyloArthritis International Society) suggested criteria defining the entity of axial
34 spondyloarthritis (axial SpA) including a broader set of patients by focusing on MRI findings and HLA-
35 B27 (1,2). This entity includes patients with sacroiliac joint changes on x-ray (i.e. fulfilling the 1984
36 New York AS criteria) as well as those with similar symptoms but without radiological findings (“non-
37 radiological axial spondyloarthritis, nr-AxSpa”). The prevalence for AS has been estimated to be
38 between 0.1% - 0.2% of the population and the incidence rate to 6/100.000/year in Western Europe.
39 AS is more common in males (male to female ratio is estimated to be 2-3:1).

40 *Clinical features and course of disease.*

41 AS is a chronic inflammatory disease that involves primarily the sacroiliac joints and the axial skeleton.
42 Further, the entheses, peripheral joints and extra-articular organ sites such as the anterior uvea
43 maybe involved. Clinical manifestations usually begin in late adolescence or early adulthood and onset
44 after age 45 is rare. Classical symptoms include lower back pain with predominant nocturnal pain and
45 morning stiffness. Although AS may have a waxing and waning course it is a chronic disease that over
46 time may cause substantial pain and disability. Functional limitations in the early phases of disease
47 relate to inflammation but may increase with persistent disease resulting in new bone formation.
48 Patients with nr-axSpA can present with disease features and a level of disease activity similar to those
49 observed in patients with AS.

50 *Prognostic factors*

51 There are no solid prognostic parameters besides early radiographic progression, but male sex,
52 smoking, early age of onset, increased CRP, and hip involvement early in the disease course are
53 associated with poor prognosis.

54 *Drug treatment*

55 Non-steroidal anti-inflammatory drugs (NSAIDs) have shown documented effect to control pain with
56 acceptable safety in short term studies and form the basis of drug treatment (3). Whether the long
57 term use of NSAIDs provides beneficial or deleterious effects on the radiographic progression of the
58 disease is still under debate. Intra-articular corticosteroids may be used for sacroiliac or peripheral
59 joint inflammation whereas systemic corticosteroids in general are of little benefit. There is some
60 evidence for beneficial effects of sulfasalazine in AS patients with peripheral arthritis (4). Support for
61 the use of MTX in AS is lacking (5). Several TNF-inhibitors (TNFi) are established as second line
62 treatment option of AS (6). In recent several years studies of treatment with TNFi in AS , defined
63 according to the modified New York criteria have been published. In 2012 the first TNFi was approved
64 for the treatment of axial SpA, without radiographic evidence of AS but with objective signs of
65 inflammation by elevated C-reactive protein and / or magnetic resonance imaging, in adult patients
66 who have had an inadequate response to, or are intolerant to NSAIDs.

67 **2. Problem statement**

68 The ASAS criteria for axial SpA, the approval of TNFis for the treatment of AS as well as for nr-axSpA
69 and the use of more elaborated outcome measures for the treatment (eg. AS disease activity score, AS
70 20/40 etc.) indicates a new situation as compared to 2009 when the previous guideline was adopted
71 (7). The currently available treatment options may have implications for the choice of study
72 population, the goals of treatment, either symptomatic or prevention of disease progression (i.e., bone
73 damage) and for the choice of endpoints, the choice of comparator study duration and time points for
74 evaluation, as well as for the need for adequate discontinuation criteria. To give guidance for the
75 performance of clinical trials and evaluation of drug treatment in axial SpA, a revision of the current
76 guideline taking these new circumstances into account is considered warranted.

77 **3. Discussion (on the problem statement)**

78 The ASAS axial SpA definition will result in the inclusion of patients with earlier/less well defined
79 disease. This will likely result in less external validity of the study results. Misspecification with
80 mechanical non-inflammatory back pain may occur. The validation of imaging scores in nr-axSpA is
81 considered as a challenge. Varying prognosis in the different patient groups may influence study
82 outcome. Treatment in an early phase of the disease may improve prognosis but the risk of
83 overtreatment of patients with a persisting mild disease may alter the ultimate benefit/risk balance.

84 The GL will discuss how the new ASAS criteria will apply to the inclusion and characterization of patient
85 populations for inclusion in trials for regulatory purposes. It will also discuss the use of newer outcome
86 measures to fulfil regulatory requirements.

87 The GL will not include aspects of SpA in children since this has been addressed in the Guideline on
88 Clinical Investigation of Medicinal Products for the Treatment of Juvenile Idiopathic Arthritis.

89 **4. Recommendation**

90 The RIWP recommends that an updated guideline on the clinical investigation of medicinal products for
91 the treatment of axial spondyloarthritis, addressing issues on adequate patient populations and
92 outcome measures for clinical trials.

93 **5. Proposed timetable**

94 The draft guideline may be released for consultation by Q2 2015 and expected to be adopted by 1Q
95 2016.

96 **6. Resource requirements for preparation**

97 The RIWP will nominate a rapporteur within the group but will relay on the competence of the entire
98 group as well as consulting other WPs or Committees as well as external experts.

99 **7. Impact assessment (anticipated)**

100 An updated guideline taking recent changes in classification and treatment options for patients with
101 axial spondylarthritis into account will facilitate the development of new drugs to meet important
102 medical needs.

103 **8. Interested parties**

104 EULAR, ASAS, national rheumatology associations, patients associations.

105 **9. References to literature, guidelines, etc.**

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