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4 **Guideline on the clinical evaluation of medicinal products**
5 **for weight management - Addendum on weight control in**
6 **children**
7 **Draft**

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9 This guideline replaces Guideline on clinical evaluation of medicinal products used in weight control -
10 Addendum on weight control in children (EMA/CHMP/EWP/517497/2007).
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12 Comments should be provided using this [EUSurvey form](#). For any technical issues, please contact
13 the [EUSurvey Support](#).

Keywords	<i>Obesity, children, adolescents, overweight</i>
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14 Guideline on the clinical evaluation of medicinal products
15 for weight management- Addendum on weight control in
16 children

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35 **Executive summary**

36 This is the first revision of the *Guideline on clinical evaluation of medicinal products used in weight*
37 *control - Addendum on weight control in children* (EMA/CHMP/EWP/517497/2007).[1]

38 The Addendum should be read in conjunction with the Guideline on clinical evaluation of medicinal
39 products used in weight management (EMA/CHMP/311805/2014).[2]

40 The Addendum provides guidance on the clinical investigation of medicinal products for weight
41 management used in children and adolescents.

42 **1. Introduction (background)**

43 Overweight and obesity in children and adolescents have become a major health problem worldwide
44 and their incidence is steadily increasing.[3] Changes to the addendum are introduced with the aim to
45 align the addendum with the guideline for adults (where appropriate) and to reflect recent
46 developments in this rapidly evolving field with respect to approval of new medicinal products for the
47 treatment of childhood and adolescent overweight and obesity as well as clinical practice guidelines.
48 When treating overweight and obesity in children and adolescents, there are not only specific ethical
49 considerations, but also unique factors related to growth and development that should be thoughtfully
50 considered.[4,5] Therefore it is requested to monitor body composition when feasible.

51 As overweight and obesity frequently persist in adulthood, they represent a risk factor for all obesity-
52 related co-morbidities in later life. This emphasises the need for the development of effective
53 treatments.

54 **2. Scope**

55 The focus of this paediatric addendum is on clinical investigation of treatment for weight management
56 in children and adolescents.

57 The definition of overweight and obesity, suitable endpoints and specific methodological issues of
58 clinical trials for treatment of weight management in children and adolescents are addressed.

59 **3. Legal basis and relevant guidelines**

60 This is an addendum to the *Guideline on clinical evaluation of medicinal products used in weight*
61 *management* (EMA/CHMP/311805/2014).[2]

62 This addendum should be read in conjunction with the introduction and general principles of Annex I to
63 Directive 2001/83/EC, as amended, and all other relevant EU and ICH guidelines.

64 All pertinent elements outlined in the current and future EU and ICH guidelines and regulations should
65 be considered especially the following:

- 66 • ICH E11, Clinical investigation of medicinal products in the paediatric population
67 (CPMP/ICH/2711/99)
- 68 • Guideline on the investigation of medicinal products in the term and preterm neonate
69 (EMA/267484/2007)
- 70 • ICH E11A Guideline on pediatric extrapolation (EMA/CHMP/ICH/205218/2022)

- 71 • Reflection paper on investigation of pharmacokinetics in the obese population
72 (EMA/CHMP/535116/2016)
- 73 • Clinical trials in small populations (CHMP/EWP/83561/2005)
- 74 • ICH E9 (R1) addendum on estimands and sensitivity analysis in clinical trials to the guideline
75 on statistical principles for clinical trials (CHMP/ICH/436221/2017)
- 76 • Guideline on pharmaceutical development of medicines for paediatric use
77 (EMA/CHMP/QWP/805880/2012 Rev. 2)
- 78 • Guideline on the choice of the non-inferiority margin (EMA/CPMP/EWP/2158/99)
- 79 • Points to consider on switching between superiority and non-inferiority (CPMP/EWP/482/99)
80 and Draft Guideline on non-inferiority and equivalence comparisons in clinical trials
81 (EMA/301654/2025)

82 **4. Definition of overweight and obesity in children and** 83 **adolescents**

84 A wide variety of definitions for childhood and adolescent overweight and obesity are in use. Recently,
85 experts have advocated to differentiate clinical obesity from pre-clinical obesity.[6] Clinical obesity is
86 defined as a chronic, systemic disease characterised by alterations in the function of tissues, organs, or
87 the individual, resulting from excess adiposity. Pre-clinical obesity is seen as a condition with excess
88 adiposity with preserved function of other tissues and organs. This distinction is important as the
89 intensity of treatment is tailored to the extent of deleterious effects on tissue, organs and/or
90 functionality and well-being of each individual. Therefore, trial subjects should be assessed in terms of
91 impact of excess adiposity and be representative of the target population.

92 For the initial assessment of adiposity, the body mass index (BMI = bodyweight (kilogram)/ (height
93 [metre]²) is used in adult populations and 25 and 30 kg/m² cut-off points are recognised
94 internationally as a definition of adult overweight and obesity, respectively. BMI cut-offs based on
95 pooled international data that link the accepted adult cut-off points to cut-off points related to age and
96 sex for children should be used to define overweight and obesity in the paediatric population.[7, 8]
97 Other anthropometric measures, in particular weight-to-height ratio (WtHR) may also be useful to
98 identify excess adiposity in children or adolescents.[6]

99 **5. Estimands and how to implement them in clinical trials**

100 The scientific question(s) of interest, i.e. what the trial seeks to address, and consequently the
101 target(s) of estimation (estimand) should be clearly specified. Trial planning, design, conduct, analysis,
102 and interpretation must be aligned with the estimand. Reference is made to ICH E9 (R1) addendum on
103 estimands and sensitivity analysis in clinical trials (EMA/CHMP/ICH/436221/2017).

104 To adequately assess and understand the treatment effects, they need to be precisely described using
105 the estimand framework as laid out in ICH E9 addendum (R1),[9,10] which, among other aspects,
106 emphasises the importance of adherence to treatment and pre-specification of handling of intercurrent
107 events. The nature of an intercurrent event dictates the strategy for how it should be handled. The
108 estimand framework also highlights the importance of correctly addressing missing data, as well as
109 carrying out sensitivity analysis to evaluate the robustness of the results.

110 **5.1. Treatment condition**

111 **5.1.1. Non-pharmacological interventions**

112 The previous attempt(s) of lifestyle therapy (nutritional, psychological and physical activity
113 interventions etc.) without sufficient effect should be carefully recorded.

114 Lifestyle therapy should be offered as a background treatment for all interventions. The lifestyle
115 therapy offered should be clearly described in the protocol both in terms of intensity and monitoring.

116 Lifestyle therapy should be offered to all participants in the trial. It is considered that the
117 standardisation of food intake per se is not feasible.

118 A lifestyle therapy run-in phase is not mandatory but can be considered to harmonise the approach for
119 lifestyle therapies that need to be implemented. The run-in phase should be short (no longer than one
120 month), as participants will already have been exposed to various lifestyle therapies before initiation of
121 drug treatment.

122 **5.1.2. Pharmacological interventions**

123 Trials should in general be randomised, double-blind and placebo-controlled. Although a placebo-
124 controlled trial is more sensitive to show superiority, issues like drop out due to lack of efficacy and
125 factual unblinding related to gastrointestinal adverse events are less of an issue in active-controlled
126 than in placebo-controlled studies. As new treatments are becoming available, the use of placebo may
127 pose ethical challenges as withholding active treatment may lead to substantial and potentially lasting
128 increases in obesity severity. Imperfect blinding and knowledge of receipt of the intervention may also
129 impact adherence to standard of care treatment.

130 An alternative to placebo-controlled trials is the use of active-comparator trials. Such trials typically
131 aim to demonstrate non-inferiority, i.e. that an experimental treatment is not less effective than an
132 active control by more than a predefined non-inferiority margin. However, these trials may require
133 large sample sizes and may complicate the interpretation of efficacy and safety outcomes. In addition,
134 in childhood and adolescent overweight and obesity, treatment effects are highly context-dependent,
135 which poses challenges to the constancy assumption underlying non-inferiority trial designs. For these
136 reasons, placebo-controlled trials remain the preferred option to allow for an accurate estimation of the
137 efficacy and safety of new medicinal products. All trials should incorporate design features such as
138 limiting the time of exposure to placebo, use of rescue medications, treatment withdrawal or tapering
139 in the context of excessive weight loss. It should be prespecified in the protocol when tapering and use
140 of rescue medication should occur and data on this is expected to be reflected in the summary of
141 product characteristics (SmPC). Up-titration to the patient-relevant dosage and an upper dose limit
142 with stop criteria for up-titration may be more appropriate than having different maintenance doses.
143 Dose modifications should be possible for efficacy and tolerability (e.g. intolerable gastrointestinal
144 symptoms).

145 **5.2. Target populations**

146 Because the underlying causes, health impacts, and effective treatment strategies for overweight and
147 obesity differ markedly between children, adolescents and adults, age-specific approaches are required
148 when designing and implementing weight management interventions.[11] Therefore, the results of
149 studies in adults can normally not be extrapolated to adolescents, nor can the results from adolescents
150 be expected to be possible to extrapolate to younger children.

151 Puberty significantly influences both the physiological consequences of overweight and obesity and the
152 effectiveness and approach to their treatment, as changes in body composition, hormones, and
153 metabolic processes during this developmental period affect weight trajectory and health outcomes.[8]
154 Therefore, in this addendum, the following two categories are used to define subgroups of the
155 paediatric population:

- 156 1. Pre-pubertal;
- 157 2. Pubertal: from Tanner stage 2.

158 The trial design (including the inclusion and exclusion criteria) and execution need to aim for a
159 sufficiently diverse sample to allow generalisability to the target population for the indication under
160 investigation. As the field is still very much evolving, Body Mass Index (BMI)-related metrics remain
161 the most used measures to classify childhood and adolescent overweight and obesity.

162 **Inclusion criteria:** It is recommended that separate trials for pre-pubertal (up to Tanner stage 2)
163 versus pubertal children (from Tanner score 2) are performed or at least the randomisation is stratified
164 for this prognostic factor. This is based on the considerable physiological changes in body composition,
165 metabolic responses and behaviour occurring during puberty.[12] Trials should be conducted in
166 children or adolescents with overweight and at least one weight-related coexisting condition or with
167 obesity and whom have a documented history of lifestyle therapies that did not achieve sufficient
168 weight management. Children and adolescents of all ages for which the treatment is intended should
169 be presented in sufficient large proportions in the study.

170 **Exclusion criteria:** Children and adolescents with monogenic or syndromic obesity should be excluded
171 from pivotal trials when additional safety concerns are anticipated or when differences in terms of
172 efficacy are expected. In such cases, dedicated clinical trials are warranted. Overlap of adaptation of
173 medication for glucose control immediately after randomisation and initiation of the investigational
174 medicinal product (IMP) should be avoided. This means that the upper HbA1c level at inclusion should
175 be in line with treatment guidelines to ensure that type 2 diabetes mellitus patients with adequate
176 glycaemic control will be enrolled.

177 ***5.3. Efficacy variables (or endpoints) to be obtained for each patient***

178 The recommended primary endpoints in paediatric obesity trials are BMI-related metrics. Multiple
179 additional BMI-related metrics should be reported as secondary endpoints to allow comparisons across
180 trials.

181 Albeit BMI-related metrics are not ideal, as they do not differentiate between fat and lean mass and do
182 not capture clinical implications of excess adiposity, they are still the most practical in use.

183 As primary endpoints, BMI-related metrics (expressed as percent change from baseline), BMI percent
184 of the 85th, 95th percentile (or BMI percent of other cut-off points for overweight and obesity,
185 depending upon which growth references are used) or percent of the median BMI can be used. Age-
186 and sex-adjusted metrics should be used, with preference for the WHO charts. Other anthropometric
187 measures such as waist circumference and WTHR should be included as secondary endpoints as they
188 reflect the effect on visceral adiposity better than BMI. To confirm the change in adiposity, imaging
189 techniques (e.g. dual energy x-ray absorptiometry (DXA) or magnetic resonance imaging) capable of
190 quantifying body fat mass and distribution should be included when feasible as relevant secondary
191 endpoints to ensure that any weight reduction is caused primarily by a reduction in fat content and not
192 in lean body mass. In addition, muscular functionality tests may be included if feasible. Bioelectrical
193 impedance is still insufficiently standardised and too variable for use in the context of clinical trials.
194 Further relevant secondary endpoints, such as validated age-appropriate psychosocial and/or personal-

195 reported outcomes, metabolic, cardiovascular and mechanical biomarkers, should be considered. In
196 particular, measures of quality of life should be included as secondary endpoints.

197 The population-level summary should be a difference in means at least for the BMI endpoints and a
198 difference in proportions for the binary endpoints.

199 If another primary endpoint is used, it should be sufficiently justified and it is recommended to be
200 discussed in advance within a CHMP scientific advice procedure.

201 **5.4. Strategies to address intercurrent events**

202 Different estimands may be warranted depending on the clinical question of interest and the resulting
203 clinical trial design, e.g. binary or continuous endpoint, active or placebo-controlled trial, non-
204 inferiority or superiority objective.

205 Relevant intercurrent events to be considered include, but are not limited to, treatment
206 discontinuation, changes in medication such as use of additional or alternative weight management
207 medications (e.g. metformin, insulin, GLP-1 receptor agonists, orlistat), changes in background
208 therapy (e.g. changes in physical activity and diet) and changes in dose. For the management of
209 intolerable GI symptoms, the dose may be delayed, down-titrated, or held, as needed. Of note,
210 temporary study drug interruptions will be permitted if participants undergo a procedure unrelated to
211 the study that requires temporary suspension of study treatment or experience adverse events that
212 are expected to improve. Concomitant medication/interventions should be differentiated from
213 prohibited drugs and specified under which conditions they might be used. Given that some approved
214 antidiabetic medicinal products are associated with a weight-modifying effect in either direction, this
215 potential effect should be anticipated as much as possible and a strategy to handle this intercurrent
216 event defined and justified in the protocol. In addition, depending on the population selected, death
217 might require incorporation into the estimand definition. Dose modifications, temporary study drug
218 interruptions, treatment discontinuation, use of prohibited medications and death should be considered
219 as intercurrent events. The frequency and timing of all intercurrent events need to be compared
220 between treatment groups.

221 For superiority objectives, the intercurrent event of treatment discontinuation should be handled with a
222 treatment policy strategy addressing the treatment effect regardless of discontinuing treatment. The
223 number of patients who discontinue treatment is in general high in obesity trials and every effort
224 should be made to keep patients who discontinue treatment within the study for further
225 measurements. Similarly, a treatment policy strategy is relevant for changes in background therapies,
226 which is equivalent to considering them as part of the treatment regimen of interest. Handling the use
227 of alternative weight management medications/rescue medications that are not considered part of the
228 treatment regimen of interest (i.e. therapies that could not be co-administered with the IMP), on the
229 other hand, is challenging and there might not be the most appropriate strategy to address them as
230 several strategies are relevant: a treatment policy strategy reflecting the outcome in clinical practice
231 could be appropriate, but a hypothetical strategy, in which alternative medication is assumed not to
232 have been an option, might be more relevant. If rescue medication is used more often in the
233 comparator arm, the estimand using a treatment policy strategy might lead to the smaller treatment
234 effect estimate than the one using a hypothetical strategy (and vice versa). It is recommended to
235 prespecify expectations on the frequencies of important intercurrent events and by default compare
236 the patterns between the arms at the analysis stage to understand whether an imbalance could have
237 unexpectedly driven the conclusion. Supplementary analyses, possibly aiming at other targets of
238 estimation, should be performed to assist in the interpretation of trial data.

239 For non-inferiority objectives, particular attention should be given to intercurrent events that might
240 make the investigated treatments appear more similar or where participants are expected to do
241 considerably better after the intercurrent event, for example initiating / changing additional
242 medications (e.g., the background medication), or switching from, modifying, or discontinuing the
243 assigned treatment. The intercurrent event of switching from the assigned treatment to the active
244 comparator or new IMP should not be handled with a treatment policy strategy. This is especially
245 important when the rates of intercurrent events differ between arms, and such events are more
246 common on the test arm. In these settings, a continuous endpoint is seen as more sensitive and a
247 hypothetical strategy for this class of intercurrent events may be preferable.

248 The choice of estimands should be justified and ideally discussed within the CHMP scientific advice.

249 **6. Trial methodology**

250 Pivotal trials should be conducted by physicians experienced in the management of childhood and
251 adolescent overweight and obesity. They should be performed in centres with access to the relevant
252 multidisciplinary teams that can provide expertise in drug monitoring, diet, psychological support,
253 behavioural interventions and physical activity.

254 The confirmatory trial should ideally be stratified for important prognostic factors (e.g. BMI, sex,
255 age/paediatric population, region, glucose lowering agents, prediabetic status), which in turn should be
256 adjusted for in the statistical analysis models, and appropriate subgroup analyses should be pre-
257 planned. A treatment phase of at least 6 months may be sufficient if a medicinal product has a known
258 mechanism of action and data in the adult population are available. Treatments with a new mechanism
259 of action or no data in other age groups may require a longer treatment period.

260 The use of placebo-controlled trials in obesity (particularly in long-term studies) may be associated
261 with a high rate of dropouts. This has been the case in many recent studies and has complicated the
262 evaluation of the results. For this reason, an effective non-pharmacological intervention is warranted,
263 and the sponsor is urged to implement all possible measures to minimize the number of dropouts,
264 even when randomised treatment is discontinued.

265 Choices made for statistical analysis, including the handling of missing data, should be aligned to an
266 agreed target of estimation. The primary analysis will be associated with various assumptions which
267 can be examined through a sensitivity analysis aligned to the same target of estimation. As with
268 adults, the problem of treatment discontinuation is recognised in both the placebo and active
269 treatment groups. Historically there have been high rates of premature subject withdrawal in trials of
270 medicinal products used in the management of overweight and obesity. The effect estimates are
271 strongly impacted by a large number of early treatment discontinuations or study withdrawals. Every
272 effort should be made to follow-up these patients fully to be able to include them with a treatment
273 policy strategy, if seen as appropriate. Missing data imputation should be performed in line with the
274 proposed estimand definition. However, single-imputation inference tends to overstate precision
275 because it omits the between-imputation component of variability, therefore, multiple imputation
276 would be preferable (e.g. retrieved-dropout-based multiple imputation or reference-based multiple
277 imputation in case of a treatment policy strategy for treatment discontinuation). Therefore, methods
278 such as last observation carried forward (LOCF) and baseline observation carried forward (BOCF) are
279 inappropriate, the later also because of a possible placebo effect. Tipping point analyses which explore
280 the extent to which assumptions in respect for imputation or modelling for handling missing data would
281 have to be violated before a positive result is lost could be conducted as sensitivity analysis to show
282 how robust the results are to the handling of missing data. Patients should be seen on a regular basis

283 and their weight and height as well as metabolic, mechanical and mental issues monitored from
284 baseline to final analysis.

285 After completion of the study, patients should be allowed to either switch to existing effective
286 treatments or continue the experimental treatment in an open-label extension phase to assess
287 effectiveness and tolerability in the context of longer-term exposure. The applicant should present
288 measures to ensure long-term follow-up of possible adverse reactions and efficacy in the paediatric
289 population. Subgroup analyses should be performed for all prognostic and possible predictive factors
290 (e.g. BMI, prediabetic status, age/paediatric population, region, ethnic origin and sex) and possible
291 interactions (with for example antihypertensives, glucose lowering and lipid modifying agents),
292 especially including the stratification factors.

293 **7. Assessment of safety**

294 Safety aspects are dependent on the mechanism of action of the IMP and the available data in adults.
295 Appropriate safety data should be collected during the entire drug treatment period, which will usually
296 be from 6 months up to one year, and for the duration of the open-label extension. This data should
297 notably encompass the adverse events related to lipid profile, liver function, cardiovascular system
298 function and weight regain under treatment. For centrally acting anorectic agents, it is recommended
299 that special attention and monitoring is afforded to neuropsychiatric events such as depression, sleep
300 pattern and nightmares, assessment of self-esteem, anxiety, self-injury, aggression or suicidality.
301 Patient Reported Outcomes and Patient Reported Experience Measures may be useful to assess the
302 incidence of such events.

303 In growing children, height velocity should be monitored alongside standard safety assessments.
304 Pubertal development should be evaluated using Tanner stages at baseline and at regular intervals
305 (e.g., every 3–6 months). The method of assessment should be prespecified, preferably clinician-
306 assessed or using validated self-assessment tools, to ensure consistency and reliability. For centrally
307 acting anorectic agents the abuse potential should be considered and factored into trial design in an
308 appropriate manner. This is especially important in the adolescent age group.

309 The possibility of an excessive pharmacodynamic effect, e.g. excessive weight loss, should be
310 considered in the protocol and adequate guiding should be available if concerns about excessive weight
311 changes, or mental health issues arise.

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345 **Definitions**

- 346 BMI: body mass index
347 BOCF: baseline observation carried forward
348 DXA: dual energy x-ray absorptiometry
349 IMP: investigational medicinal product
350 LOCF: last observation carried forward
351 SmPC: summary of product characteristics
352 WtHR: weight-to-height ratio