Nonprescription Simvastatin in the United Kingdom

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Overview

1. Classification of medicines in UK

- 2. Reclassification ("switch")
- 3. Issues considered in switch of simvastatin

Classification of Medicines in UK: Prescription

Prescription Only Medicines (POM)

- Safety concerns
 - Requires doctor's supervision
 - Contains substance(s) requiring investigation
 - Requires injection
- All new medicines

Classification of Medicines in UK: Nonprescription

Pharmacy (P)

- Pharmacies (only)
- Under pharmacist/staff supervision
- US: "Behind-the-counter"
- Simvastatin

General Sales List (GSL)

- Pharmacy shelves, supermarkets
- Analgesics, cough-cold medications
- US: "Over-the-counter"

Overview

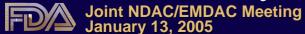
1. Classification of medicines in UK

2. Reclassification ("switch")

3. Issues considered in switch of simvastatin

Application to Reclassify Medicines: POM to P

- Safety profile
 - Reports of adverse reactions
 - Post-marketing surveillance studies
 - Published literature
 - Safety reviews
- Patient information (proposed labeling)
- Training and education of pharmacists & staff
- Evaluation by clinical expert (sponsor)



Reclassification Process

- Submission of application to Medicines & Healthcare Products Regulatory Agency (MHRA)
- Application Review
 - May include Committee on Safety of Medicines (CSM)
- 3. Consultation letter
- 4. Review of responses
- MHRA action

Zocor Heart-Pro®

Each Zocor Heart-Pro® film-coated tablet contains 10 mg simvastatin.

Simvastatin belongs to a group of medicines known as statins which significantly reduce the amount of cholesterol in your blood. Too much cholesterol in your blood builds up in the walls of the arteries and causes plagues to form. This can lead to a narrowing of the coronary arteries, just like hard water furs up a water pipe. Heart attacks can then happen when a blood clot forms in a narrowed coronary

ketoconazole. HIV protease inhibitors. erythromycin, clarithromycin, telithromycin or nefazodone or if you are already taking a prescription cholesterol lowering medicine. Please read the enclosed patient information leaflet for important safety information. Do not store the tablets above 30°C. Keep them out of the reach and sight of children

> ALS P10 9UF

> > P

Zocor Heart-Pro® is for people who have a moderate risk of SD coronary heart disease (heart disease due to build up of plaques in the coronary arteries).

Your Pharmacist can advise you further and help you to identify your risk level.

SWARIOW ONCE RIDICE GVER CYCHINE DO NOT TAKE HIGH one tablet each day.

Do not take Zocor Heart-Pro® if: you know that you have liver disease, or you know that you have abnormal liver function blood tests; you could become, are pregnant or breast-feeding; you are allergic to any of the ingredients; you have had muscle problems after taking a cholesterol lowering medicine in the past; you are taking itraconazole.

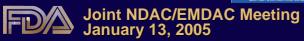


Merck background package, p. 343

Questionnaire

Zocor Heart-Pro HEAR	T HEALTH		Johnson-	Johnson	MS
ZOCOR HE	Name and Address of the Owner, where the Person		Zoca	Pro)
Please answer all the questions below by tickin If you are not sure about any of the questions, I			Date:	tatin	
1 ABOUT YOU		A condition called 'familial hyp	ercholesterolaemia*	Yes 🔲	No [
Are you:		(FH), (a very high cholesterol le	vel that runs in famili	es)	
Male and aged 45 to 54? Male and age	d 55 to 70?	High blood pressure that your	doctor has		100
Female and aged 55 to 70?	200	prescribed medicine for		Yes	No
 If you are female, have you reached the menopause? If none of these applies to you, talk to the pharmacist before go 		If you haven't had your blood pressur your pharmacist may be able to offer	you a check.	t sar months,	
Do you of the following sigh factors and the con-		Do you have any of these condit			
Do any of the following risk factors apply to you?	Yes No	Liver disease or abnormal liver			
Current smoker, or a smoker within the last five years	Yes No No	Muscle problems that run in year			
 A family history of early heart disease: your father or brother had a heart attack or 		(for example, muscular dystrop	nies)		
angina before the age of 55		 An underactive thyroid gland Kidney problems 		Yes 🗌	No.
- your mother or sister had a heart attack or		Kidney problems If you are not sure about any of these	ninne est the ni-		NO I
angina before the age of 65	Yes No	ir you are not sure about any of these	, preside aux me pharma	Lege.	
Angine is heart pain in the chest brought on by exercise or e		Have you recently had unexpla			
 Overweight Your pharmacist can help with this if you know your height, 	Yes No No	pain brought on by exercise or	exertion?	Yes	No
rour pharmacist can help with this if you know your height, weight and waist measurement.		Do you drink an average of mo	re than four units of		
Height strooms Weight stored W		alcohol a day (if you are a man			5571
Height storm Weight storm W	and Intern	(if you are a woman)?		Yes	177
Family origin from South Asia*	Yes No No	1 unit is 1/2 a pint of beer, one small	glass of wine or one put	measure of	spirits
(for example, India, Pakistan, Bangladesh or Sri Lan	A STATE OF THE PARTY OF THE PAR	Do you drink more than one little	re of grapefruit		
"Being of South Asian origin means your risk of heart disease is higher		juice a day?		Yes	No
		Have you been prescribed cho	lesterol-lowering		
2 ABOUT YOUR MEDICAL HISTORY		medicine in the past?		Yes	No
Has your doctor told you that you have or have had as		. Are used taking madisir - success	that by your do to 4	Van 🗆	No
• Diabetes	Yes No	Are you taking medicine prescr			
 Heart problems (for example, heart attack or angina 		Please write down the names of any of the names, please ask the pharm	medicines you are taki acist.	ng. If you are	n unsu
a stroke or peripheral vascular disease (for example,	Yes No				
poor blood flow to the legs with pain on walking)	Tes LI No LI				
Why not join the Healthy Heart Programme today?		Prison & Johnson-MSO to contact the In the 1	uture about the Healthy Hea	rt Programme	
The Healthy Heart Programme is a free service from	and heart-wieled products.	Ves No			
Johnson & Johnson MSD. Register today at www.heartpro.co.uk and you'll find it's full of informative,	Title: (W. Mrs. Ms. Miss)	First name:	Last name:		
encouraging and helpful features: • Lifestyle advice on exercise and diet	Address and postcode	ŧ			
 Your personalised heart health profile 					
 Special offers and discounts on heart-related products and services 	Email:				
 The ability to receive your confidential Heart-ProTM 					
Cholesterol Test results online To register, simply go online to www.heartpro.co.uk	Name and town of pha	rmacy:			
Alternatively, to receive tree information and offers by post					
from the Healthy Heart Programme on improving your heart	I give explicit cornect for this	s pharmacet to keep the boltom copy of this	form to contact me in the	HH	
health, complete and return the top copy of this form to:	Bullion and Bullion and	Heat-Pro** products. Yes No			

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Patient Information Leaflet

Zocor Heart-Pro®

Worker La Occom HEART-PROPO?
 Earn Illin concett stated contains 10 mg sinvestatin as the active imposfer.
 The cactive state contains according and (EXD), butylated hydrographical (EXD), clote acid monthydras (EXD), clote acid monthydra

The marketing authorisation holder is: Johnson & Johnson+MSD Consumer Pharmacouticals. Enterprise House, Station Road, Loudwater, High Wycombe, Buckinghamshire HP10 9UF.

Manufacturer: Merck Manufacturing Division, Merck Sharp and Programme to help you, Dohme Limited, Northumberland NE23 3JU, UK. WHAT IS ZOCOR HEART-PROP FOR?

heart disease because of build up of plaques in the coronary . Innov you have liver disease or you have been told you have nces of having a heart

The active immediate in Zoner Mand-Dunit minuscription belongs to triglycerides in your blood and raises HDL (good) cholesterol. LDL that closs your commany arteries, HPL is called "mont" cholestorn because it helps to protect against heart disease. Too much cholesterior in your blood builds up in the walks of the coronary arteries causing plaques to form. This leads to a narrowing of the coronary afteries, just like heat water fun up a water pipa. Heart attacks can shen happen when a blood out forms in a narrowed

help to reduce build-up of artery-narrowing plaques. In order to benefit from treatment, these tablets should be taken regularly on use of the build up of plaques. Reducing this risk with thes tablets and changes to your lifestyle needs to be a lifelong effort.

Zocor Heart-Profit reduces the levels of had cholesterol in the

You are also likely to be at moderate risk if you are a man aged en 45 and 54 or a woman aged 55 or over and you answer

If, in addition, you take no physical exercise other than normal daily activities, your risk of a heart attack is further incressed,

WHAT ELSE CAN I DO TO REDUCE MY RISK OF A HEART

At the same time as taking Zocor Heart-Profitablets, try to reduce your risk of coronary heart disease by doing the folio

your sea or contrary reset classes of corry in following:

- Stop smoking - them is strong evidence to link cigarette amoking with heart classes. The risks increase with the number of cigarettes you smoke each day, but risks still exist even if you amoke as little as five a day. It is better to also promising allowater printer than set and days an increase.

- Zocor Heart-Pro® tablets come in calendar packs containing

 and take more exercise.

 Exercise a brisk walk to the shops can help. Swimming is exercise – a crisic waix to the shops can help. Swimming is a good all-nound exercise that you could consider doing, as it is something you can gradually build up without overficing it to start with. You could by adding the following to your daily routilise: vigorous housework, waix upstairs more often (and don't take the lift or excellator when you see out, and gendering the country of the country of

Your pharmacist can provide details of a Healthy Heart

For more information a mail toposticimed on the

If you have an under active thyroid gland (hypothyroidism), kidney problems, a family history of muscle disorders or are aged over 70, you should check with your doctor before taking this product. This product contains lactose, if you have been told by you

doctor before taking this medicinal product Zonor Heart-Proft should not be used by children

You are tikely to be at moderate risk if you are a managed 55 or over.

If you are in one of the groups below, you are at a higher risk of coronary heart disease. You should discuss your condition with coronary heart disease. You should discuss your condition with your doctor since you are likely to need more than these tablets



If you think any of these apply to you or you are unsure that you 🤎 CHECKING YOUR CHOLESTEROL

check with your doctor before taking Zocor Heart-Profi

5.5 mmolf, you should talk to your dector because you may need more than Zocor Heart-Pro® to recluce your cholesterol levels.

BEFORE YOU TAKE ZOCOD HEADT DOOR If you are taking any other medicines, apeak to your phermanist

DRIVING AND ZOCOR HEART-PROP

exercise, or recent strain or injury.

in addition to the medicines lated in the section "Is

cription cholestero-lowering medicines (such as bezafibrate, nithreall and high doses of niacin or nicotinic acid (more

appears very dark in colour, this may mean that you have a liver problem. So, stop taking your tablets and see your doctor.

WHAT ELSE DO I NEED TO KNOW?

not drink very large quantities (more than 1 fitre a day). However, just drinking one 250 ml glass a day is unlikely to cause problems DOES ZOCOR HEART-PROS REACT WITH OTHER

in addition to the medicines listed in the section "While you are taking Zocor Heart-Prof", other medicines may cause problems when you take them with these tablets.

- antibiotics), you should mention that you are taking Zocor Heart-Prof
- WHAT IS THE DOSE OF ZOCOR HEART-PROG?
- time one screen every relating. Secretary in a screen water from a contract water. The evening is the best time because it means that you medicine will be working when your body is producing the most choissterol. Soor Heart-Profit should be taken regularly and on a long-term basis in order to gain the full benefits of treatment.

If you take too many tablets by mistake, contact your doctor or

Healthy Heart Programme.



	>
Катю	
Address	
Email:	

If you have a moderate risk of heart disease, reducing the level of cholesterol in your blood will reduce your risk. Your pha of choiseteral in your blood will reduce your risk. Your phurmacist can arrange to cheek your chesterated level, but it is not recreasing to show this before you start Zocor Heart-Pref. Chocking your chelesterol can provide additional information and can be helpful to show your progress while taking Zocor Heart-Pref. If your feating LDL-choiseteral measurement is showe 55 mmolt), peaks to your destine.

This product can cause dizziness. If affected, do not drive or person reachings, such assertion product on cause dizziness. If affected, do not drive or person reachings, and transfer and the product of the product o

Rarely, a few patients have experienced the following: liver disease (e.g., yellowing of the skin or the whites of your eyes, dark selaured urine), musels disease (seles and panel) which can be severe (see "Vihile you are taking Zoor Heart-Prof" section), or an allergic reaction. The allergic reaction may include: swelling of the face or neck, muscle and joint pains, joint and The chance of your muscles being affected is greater if you drink a birth temperature. Bushing, officulty in beathing, or tredness If any of these hancen to you or you have any other unusual

MOW SHOULD LETTING THE TANKETON

Do not store your tablets above 30°C. Keep them out of the sigh

REMEMBER this medicine is for you. Do not share it with anyone else. It may not suit them.

Date the leaflet was prepared: May 2004



Overview

1. Classification of medicines in UK

- 2. Reclassification ("switch")
- 3. Issues considered in switch of simvastatin

Public Consultation Letter: Issues Considered by MHRA

- Potential for myopathy/rhabdomyolysis
- Potential for liver toxicity
- Possible use by pregnant women
- Consumers' ability to self-diagnose
- Consumer knowledge of LDL-C levels
- Adequacy of pharmacy staff training

MHRA: Potential for Myopathy/Rhabdomyolysis

- Sufficiently rare
- Adequate warning

Do not take these tablets if you:

- know you have liver disease or you have been told y abnormal liver function blood tests;
- drink more than 4 units of alcohol a day for men and 3alcohol a day for women (one unit is 1/2 pint of lager, measure of wine or one short);
- have had an allergic reaction to this or similar medic any of the ingredients in the past;
- are already taking prescription drugs to lower your ch

WHILE YOU ARE TAKING ZOCOR HEART-PRO®

Very rarely, these tablets can affect the muscles. If this problem develops, it can be serious especially if you continue to take the drug. Stop taking your tablets immediately and check with your doctor if you develop generalised muscle pain, tenderness or weakness, unless it is clearly the result of flu, unaccustomed exercise, or recent strain or injury.

problems or are taking certain medicines.

In addition to the medicines listed in the section "Is Zecar Heart Pro® right for me?" this medicine can react with the to cause muscle problems:

in immunosuppressant medicine).

holesterol-lowering medicines (such as bezafibrate, gemfibrozil and high doses of niacin or nicotinic acid (more

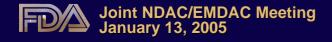
than 1000mg/day)).

Do not take these tablets if you:

- have had muscle problems in the past after taking a cholesterol lowering medicine;
 - are taking one of the following medicines:
 - oral antifungal medicines called itraconazole or ketoconazole
 - antibiotics called erythromycin, telithromycin or clarithron
 - medicines for HIV infections called protease inhibitors (such as indinavir, nelfinavir, ritonavir or saquinavir).
 - · the antidepressant nefazodone.

WHAT ELSE DO I NEED TO KNOW?

Grapefruit juice contains one or more substances that alter the metabolism of some medications, such as Zocor Heart-Pro[®]. Do not drink very large quantities (more than 1 litre a day). However, just drinking one 250 ml glass a day is unlikely to cause problems.



MHRA: Potential for Liver Toxicity

- Extemely rare
 - routine testing not required
- Adequate warnings

Do not take these tablets if you:

- know you have liver disease or you have been told you have abnormal liver function blood tests:
- drink more than 4 units of alcohol a day for men and 3 units of tion to the medicines listed in the section alcohol a day for women (one unit is 1/2 pint of lager, a pub measure of wine or one short);
 - · could become pregnant, are pregnant, are planning to become pregnant, or are breast feeding;
 - discover you are pregnant while taking Zocor Heart-Pro®. In this case you should stop taking these tablets immediately and contact your doctor;
 - have had muscle problems in the past after taking a cholesterol lowering medicine:
 - · are taking one of the following medicines:
 - oral antifungal medicines called itraconazole or ketoconaz
 - · antibiotics called erythromycin, telithromycin or clarithromy
 - medicines for HIV infections called protease inhib (such as indinavir, nelfinavir, ritonavir or saguinavir).
 - the antidepressant nefazodone.

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> ice of your muscles being affected is greater if you drink grapefruit juice, (see below) or if you have kidney or are taking certain medicines.

> eart-Pro® right for me?" this medicine can react with the drugs to cause muscle problems:

- Ciciosporin (an immunosuppressant medicine).
- Prescription cholesterol-lowering medicines (such as bezafibrate. gemfibrozil and high doses of niacin or nicotinic acid (more than 1000mg/day)).

If you go into hospital for major surgery, tell your doctor you are taking Zocor Heart-Pro® as you will need to stop taking it a few days beforehand.

If your skin or whites of your eyes turn yellow or your urine appears very dark in colour, this may mean that you have a liver problem. So, stop taking your tablets and see your doctor.

MHRA: Possible Use by Pregnant Women

- Not a concern
- Labeled for use by women 55 and over
- Adequate warnings



Do not take these tablets if you:

- know you have liver disease or you have been told you have abnormal liver function blood tests;
- drink more than 4 units of alcohol a day for men and 3 units of alcohol a day for woman (one unit is 1/2 pint of least a public

Do not take these tablets if you:

 could become pregnant, are pregnant, are planning to become pregnant, or are breast feeding;

contact your doctor;

- have had muscle problems in the past after taking a cholesterol lowering medicine;
- are taking one of the following medicines:
 - oral antifungal medicines called itraconazole or ketoconazole.
 - antibiotics called erythromycin, telithromycin or clarithromycin.
 - medicines for HIV infections called protease inhibitors (such as indinavir, nelfinavir, ritonavir or saquinavir).
 - the antidepressant nefazodone.



MHRA: Consumers' Ability to Self-Diagnose

- Pharmacist-assisted identification of (moderate) risk
 - Age
 - Risk factors
- Questionnaire
- Patient Information Leaflet (PIL)

Questionnaire

	1 ABOUT YOU
AGE	Are you: • Male and aged 45 to 54? • Female and aged 55 to 70? • If you are female, have you reached the menopause? Yes No If none of these applies to you, talk to the pharmacist before going further.
RISK FACTORS	 Do any of the following risk factors apply to you? Current smoker, or a smoker within the last five years Yes No A family history of early heart disease: your father or brother had a heart attack or angina before the age of 55
	 your mother or sister had a heart attack or angina before the age of 65 Angina is heart pain in the chest brought on by exercise or exertion. Overweight Yes No No No No No No No No No N
	Your pharmacist can help with this if you know your height, weight and waist measurement. Height ft/in or m/cm Weight stone/kg Waist in/cm
	• Family origin from South Asia* Yes No (for example, India, Pakistan, Bangladesh or Sri Lanka) *Being of South Asian origin means your risk of heart disease is higher.

Patient Information Leaflet



You are likely to be at moderate risk if you are a man aged 55 or over.

You are also likely to be at moderate risk if you are a man aged between 45 and 54 or a woman aged 55 or over and you answer yes to one or more of the questions below:

- Do you have a parent, brother or sister who suffered a heart attack younger than 55 for men or 65 for women?
- Do you smoke or have you smoked within the past 5 years?
- Are you overweight? This means you have a body mass index over 25 kg/m² (your weight in kilos divided by your height in metres squared), or your waist is greater than 40 inches or 102 cm (for men), or 35 inches or 88 cm (for women). Your pharmacist can help you answer this question.
- Are you of South Asian origin i.e. from the Indian subcontinent that includes India, Bangladesh, Pakistan or Sri Lanka?

AGE

RISKS



MHRA: Consumer Knowledge of LDL-C Levels

- Reducing LDL-C reduces risk of CHD
- No specific requirement to know initial LDL-C or monitor after starting
 - Identification of consumers at higher risk (Questionnaire – Medical History)
 - Opportunities to determine LDL-C levels
 - Referral to doctor

MHRA: Pharmacy Staff Training Package

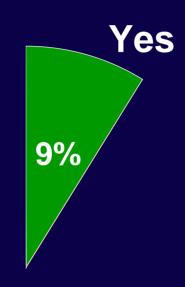
- Prepared in consultation with National Pharmacy bodies
- Distributed to pharmacists and medicine counter assistants
- Education:
 - Pathophysiology of CHD and major risk factors
 - Contraindications, precautions, possible adverse effects
 - Other interventions (e.g., lifestyle changes)

 Joint NDAC/EMDAC Meeting
 January 13, 2005

Responses to Consultation Letter

- Circulated within health services (> 250)
- 100 responses:
 - NHS Trusts (21)
 - Pharmacy bodies (14)
 - Healthcare professionals (12)
 - Royal medical colleges (9)
 - Patients (6)
 - Industry (5)
 - Other (33): medical bodies, academia, replies with no comment

Responses to Consultation Letter: POM to P Switch?



Concerns Raised in Response to Consultation Letter

- Dose (10 mg) too low / no clinical trials (≥ 40%)
- Need for cholesterol testing (≥ 27%)
- Need for liver function testing (≥ 21%)
- Potential to ignore lifestyle changes (≥ 21%)
- Cost of OTC statins (≥ 21%)

Concerns Raised in Response to Consultation Letter

- Pharmacist burden/training (≥ 16%)
- Record keeping/patient management (≥ 16%)
- Interactions with other medications (≥ 10%)
- Side effects (≥ 10%)

Summary

No direct or indirect danger to consumer health without medical supervision BUT...

"with the advice of a pharmacist and supported by a comprehensive pharmacy training package."