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203

# **JANA LASS**

Epidemiological and clinical aspects of medicines use in children in Estonia





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Epidemiological and clinical aspects of medicines use in children in Estonia



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#### LIST OF ORIGINAL PUBLICATIONS

- I Lass J, Irs A, Pisarev H, Leinemann T, Lutsar I. Off-label use of prescription medicines in children in outpatient setting in Estonia is common. Pharmacoepid Drug Safety 2011; 20: 474–481.
- II Lass J, Käär R, Jõgi K, Varendi H, Metsvaht T, Lutsar I. Drug utilisation pattern and off-label use of medicines in Estonian neonatal units. Eur J Clin Pharmacol 2011; 67:1263–1271.
- III Lass J, Naelapää K, Shah U, Varendi H, Käär R, Turner M, Lutsar I. Hospitalised neonates commonly receive potentially harmful excipients. BMC Paediatrics 2012; 12: 136.
- IV Lass J, Odlind V, Irs A, Lutsar I. Antibiotic prescription preferences in paediatric outpatient setting in Estonia and Sweden. Springer Plus 2012 (submitted)

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#### **ABBREVIATIONS**

ADR Adverse drug reaction

BNFC British National Formulary for Children

EHIF Estonian Health Insurance Fund EMA European Medicines Agency

EOS Early onset sepsis
EU European Union

FDA Food and Drug Administration

GCP Good clinical practice

GA Gestational age

GFR Glomerular filtration rate

GW Gestational weeks

ICH The International Conference on Harmonization ISPE International Society for Pharmacoepidemiology

LOS Late onset sepsis

MA Marketing authorisation

NSAID Non-steroidal anti infective drugs OTC medicines Over-the-counter medicines

OL Off-label

PDCO EMA Paediatric Committee
PICU Paediatric intensive care unit
PIP Paediatric investigation plan

PK Pharmacokinetics PMA Postmenstrual age PNA Postnatal age

PUMA Paediatric Use Marketing Authorisation SPC Summary of product characteristic SSRI Selective serotonin reuptake inhibitors

TCH Tallinn Children's Hospital

TEDDY Task-force in Europe for Drug Development for the Young

TUC Tartu University Clinics

UL Unlicensed

### **DEFINITIONS**

Crude 1 year prevalence of drug use	Proportion of the paediatric population who had one or more prescriptions issued during the study period.
Medicinal product authorised for a paediatric indication	Medicine, which is authorised for use in part or all of the paediatric population and in respect of which the details of the authorised indication are specified in the SPC.
Off-label (paediatric) use of medicines	Use of medicines, which have a local marketing authorisation (license), but do not have paediatric indications included in the marketing authorisation.
Pharmaceutical excipients	Substances other than the active ingredients, which have been appropriately evaluated for safety and are intentionally included in a drug delivery system (IPEC Europe. 2008).
Prescription rate	Ambulatory: number of prescriptions per 1000 children in the age group / per year. Hospital: number of prescriptions per 100 admissions.
Prescription prevalence rate	Proportion of treated children of all children in the age group.
Unlicensed medicines	Use of medicines without local marketing authorisation.

#### I. INTRODUCTION

All people, no matter what their age, should have access to safe and effective medicines. Still, while approximately quarter of the global population is under 15 years of age, children are not always treated in the most safe and effective way compared to adults and have even been called "therapeutic orphans" (Shirkey 1999). Many of the currently used medicines have not been clinically tested in children, thus have no paediatric labelling and are used off-label (OL). It has been shown that paediatric prescribing habits vary greatly between countries (Conroy *et al.* 2000), however, the high rates of OL medicines use have been widely described in the Western Europe and North America (Kimland *et al.* 2012), but data are scarce about the Eastern European countries.

The medicines designed for the adult population and also studied only in adults are not always suitable for treating children. Most importantly, children and especially neonates are different from adults in terms of their body composition and drug metabolising enzymes activity, which affects the pharmacokinetic (PK) profile of the active ingredients (Bartelink *et al.* 2006), but also drug formulation excipients. Thus the way in which children absorb, distribute, metabolise and eliminate drugs cannot be predicted from adult data.

In the absence of clinical trials, data on therapeutic doses for children often comes from the clinical experience of prescribers or case reports (Ceci *et al.* 2006) resulting in the wide variety of dosing recommendations in different drug information sources. The availability of dosing information in different information sources e.g. for different paediatric age groups, including neonates has been only selectively studied for a few drugs or drug groups.

Thousands of different pharmaceutical excipients are used in medicines, which make up, on average, about 90% of each medicinal product (Haywood & Glass 2011). Ideally, an excipient is pharmacologically inactive, non-toxic, and does not interact with the active ingredients or other excipients. However, in practice few excipients meet these criteria and the safety of pharmaceutical excipients is a growing concern for those treating children and especially neonates (Hall *et al.* 2004). There are currently many unknowns relating to the effects of drug formulation excipients in children, including toxicity. Several tragedies have occurred in the paediatric population as a result of the excipients, which had been tested only in the adult population. Still to this day only very few studies have been published on that topic mainly focusing on the limited number of known to be toxic excipients. It is not known how many toxic excipients are administered to children within their medicines or neither how many of the medicines that are used in children contain toxic excipients.

Drug utilisation studies involving mainly adult patients have been previously conducted in Estonia by R.A. Kiivet.

Pharmaceutical technology studies including the investigations of pharmaceutical excipients have been previously conducted in Tartu University by professor P. Veski and professor J. Heinämäki and K. Kogermann.

#### 2. REVIEW OF LITERATURE

#### 2.1. Licensing of medicines

According to current legislation all marketed medicines are required to have a marketing authorisation (MA), which defines their terms of use (European Parliament and the Council of the European Union 2001).

The licensing system of medicines was introduced in the 1960s in the aftermath of the thalidomide tragedy to establish certain basic safety procedures for MA (Permanand *et al.* 2006). The Kefauver-Harris amendment to the Food Drug and Cosmetic Act in 1962 in the US and European Directive requirements for MA in 1965 were the first legislations on licensing of medicines (Wong 2007). These documents did not include any specific guidance on the licensing of paediatric medicines.

Before a new medicine is available for use in humans, it will pass through several development phases such as preclinical and clinical studies. If there is enough data on the safety and efficacy, which is relevant to a particular clinical indication and a particular age group, a manufacturer can apply for a MA for the drug. A licence is a MA issued by the licensing authority. A licensed medicine has been assessed for efficacy, safety, and quality; has been manufactured to appropriate quality standards; and when placed on the market is accompanied by appropriate product information and labelling. An approved medicine has summary of product characteristic (SPC) which outlines the indication(s), recommended dose(s), contraindications, and special warnings and precautions for use on which the licence is based (European Parliament and the Council of the European Union 2001).

Formerly, new medicines were registered in each EU member state by the local regulatory authority. In several cases, the MA of the medicinal product was only intended in countries with a large population, such as Germany, France, the United Kingdom, Italy, and Spain. Smaller countries could obtain these medicines by import from a country that had licensed the medicinal product (Breitkreutz 2008).

Since 1995 the licensing system in Europe consists of a centralised system and a decentralised or national (European member states) system. The centralised system is administered by the European Medicines Agency (EMA) and enables the product to have a EU-wide marketing authorisation. The decentralised system is under the control of the member states and the granted MA may be recognised by other member states (Irs 2009).

In Estonia the medicines licensing system is currently administered by the State Agency of Medicines (SAM, Ravimiamet), a governmental body under the Ministry of Social Affairs. Procedures to obtain MA for the medicinal product in Estonia follows the international guidelines and is generally similar to that of other EU member states. The requirements of quality, safety and efficacy of medicines are based upon the Medicinal Products Act of 2005 (http://www.sam.ee/en/marketing-authorisation-medicinal-products).

In the US the Food and Drug Administration (FDA) gives marketing approvals to medicines (http://www.fda.gov), Therapeutic Goods Administration (http://www.tga.gov.au) is Australia's regulatory authority for therapeutic goods.

#### 2.1.1. Licensing of paediatric medicines

The early regulatory medicines licensing documents did not include children into the drug development processes (Saint-Raymond & Seigneuret 2005). Additionally to the ambiguous regulatory situation, there were multiple factors limiting the number of paediatric clinical trials, such as difficult recruitment to studies due to the small number of children suffering from specific condition, more complex study design than adult studies (e.g. age-specific drug formulations needed) and technical challenges e.g. constraints associated with blood sampling, especially in very young children (Kemper *et al.* 2011, Stötterb 2007).

The first paediatric medicines regulations were established as late as in the middle on 1990s as shown in Table 1.

**Table 1.** Regulatory measures to increase the study and labelling of medicines for children (adopted from Hoppu *et al.* 2008 and Wong 2007)

Regulations	Main aim	Year of approval
US		
The Final Rule	Manufacturers should re-examine existing data to determine whether it could be modified to include paediatric use information to the SPC	1994
Paediatric Rule	Manufacturers should conduct studies to provide paediatric information on new/marketed drugs	1998
FDA Modernisation Act (FDAMA)	Paediatric exclusivity provision for manufacturers who voluntarily conduct studies in children	1997
Best Pharmaceuticals for Children Act (BPCA)	Renewed exclusivity provision under FDAMA, additional mechanism for obtaining paediatric data for OL drugs	2002
Paediatric Research Equity Act (PREA)	Renewed requirement for paediatric studies as a law. All applications for new drugs, indication, dosage form, dosing regimen or route of administration must contain a paediatric assessment.	2003
EU		
Guidance document on the clinical investigation of medicinal products in children	Guidance to the safe, efficient and ethical study of medicines in children, had no legislative authority	1997 EU
Better Medicines for Children	Provided a legislative framework to facilitate getting safety and efficacy information on paediatric drugs	2002 EU
Medicinal products for paediatric use	Established a legislative framework of paediatric clinical studies	2006 EU
The Paediatric Regulation No1901/2006	Established a legislative framework for increasing the availability of paediatric medicines, the paediatric information and high quality research in children	2007 EU

Currently, The Paediatric Regulation is directly applicable in all EU Member States, including Estonia. The main aims of the Regulation are as follows:

- to make medicines available for children through increasing the development of medicines for children by ensuring that the medicines are subject to high quality research. At the same time avoiding unnecessary clinical trials in children and not delaying the authorisation of medicines for the adult population;
- to implement a new key element of the Regulation, a mandatory Paediatric Investigation Plan (PIP) to the process of MA;
- to create a Paediatric Committee (PDCO), which is responsible for coordinating the EMA's work on medicines for children.

#### According to the Regulation:

#### • Patented medicines:

For new medicinal products, indications, routes of administration or formulations of already patented products, pharmaceutical companies have to submit a PIP to the PDCO. The PIP sets out a programme for the development of a medicine in the paediatric population. PDCO considers whether the proposed studies will be of significant therapeutic benefit to the paediatric population. Also if there is evidence that the medicine is likely to be ineffective or unsafe in children, or that the targeted disease occurs only in adult populations or that the medicine does not represent a significant therapeutic benefit over existing treatments, the PDCO will issue a waiver. PDCO opinion on PIP is transformed into EMA decisions. Drugs that comply with the requirement get 6-months patent extension.

#### • Off-patent medicines:

A new type of MA, the Paediatric Use Marketing Authorisation (PUMA) allows 10 years of data protection for off-patent products (European Parliament 2004). In the US the paediatric medicines licensing system is somewhat more flexible than in Europe. The FDA asks pharmaceutical companies a complete Paediatric Development Plan (equivalent to PIP in EU) providing any sufficient safety data, based on the adult population. When an OL drug is used for a long period, US authorities give a paediatric authorisation based on: 1) the number of paediatric patients already treated, 2) available efficacy and safety data collected among the paediatric population, 3) the life duration of the OL product use, 4) adequate safety data based on adults. Specific and justified paediatric clinical studies are demanded only if those points are not met (Knellwolf *et al.* 2011).

Historically, in 2006 around 75% of all centrally authorised medicines were relevant for children, but only half of these had indications for using in children (http://ec.europa.eu/health/files/paediatrics/2012-09\_paediatric\_report-annex1-2\_en.pdf). Also the studies published before the approval of the Paediatric Regulation demonstrated a low number of paediatric labelling. The proportion of paediatric medicines approved each year under the EMA Centralised Procedure from 1995 to 2005 varied between 19% and 48%, with an average level of 33%

of the total EMA approvals (9.4% in neonates) (Ceci et al. 2006). Of new substances registered between 1995 and 2001, 58% were of potential use in children but only a quarter of those got paediatric authorisation (Strieker et al. 2002) and the median percentage of drugs authorised for children during these years was 35% of the total of commercially available drugs (Ceci et al. 2002). The medicines for younger age groups, especially neonates were rarely approved, the improvements occurred mainly for children over the age of six (Ceci et al. 2006, Grieve et al. 2005). Improvements in licensing of medicines were greatest in the US subsequent to the Paediatric Exclusivity Provision (Grieve et al. 2005).

#### 2.2. Paediatric drug utilisation studies

As a part of the pharmacoepidemiology, drug utilisation studies show how medicines are used in real practice and are thus useful for identifying problems in paediatric pharmacotherapy. Qualitative drug utilisation studies include the concept of appropriateness and use in addition to the prescription data also parameters such as indications, daily dose and duration of therapy (Neubert *et al.* 2008a).

#### 2.2.1. Methodology of drug utilisation studies in children

There are various study designs related to the observational research, all having their advantages and limitations. Still, the choice of the most appropriate study design to be used depends on the study question.

- Case report and case series are reports of individual patients or series of patients experiencing some unexpected event and are therefore of no particular use while studying drug utilisation.
- A cross sectional study measures both exposure to drugs and occurrence of disease in an individual or population at a specific time-point (Verhamme & Sturkenboom 2011) and has been used for describing drug utilisation in children (Nasrin *et al.* 2002) and OL medicines use (Schirm & Tobi 2002). Although cross-sectional studies are quick, easy and inexpensive (Verhamme & Sturkenboom 2011) they offer no real association between the exposure and outcome.
- A cohort study is a study where a group of people with a particular disease or taking a particular drug are followed up with regard to the occurrence of an outcome of interest. They can study rare exposure and allow the analysis of time to event, but are long lasting and expensive (Verhamme & Sturkenboom 2011). Cohort studies have been used to study paediatric drug utilisation patterns over time (Hugtenburg *et al.* 2004, Thrane & Sørensen 1999).

Some of the strengths and limitations of different data collection methods are described in the Table 2

Table 2. Selected strengths and limitations of data collection methods/data sources used in paediatric drug utilisation studies

Data source	Sample size	In-hospital	Ambulatory	Follow up	Diagnoses	OTC	Drug	Recall
		medicines	prescriptions	period	ıncluded	medicines	purchased	bias
Medicines charts	Small	+	1	Short	+	+	+	I
Prescription databases	Large	1	+	Long	-/+	1	+	I
Surveys	Small	-/+	+	Short	+	+	-/+	+

The common measures that are used in drug utilisation studies are the following: 1) prevalence (number of children who received at least one prescription per 100 individuals in the general population) as a measure of exposure and 2) number of prescriptions and number of medication packages (boxes) as a measure of drug consumption (Sequi *et al.* 2012).

The measurement of drug exposure/consumption in children is somewhat different from the adult studies. As an example, the defined daily doses (DDD) is a parameter that is extensively used in adult studies (especially antibiotics use studies), but it cannot be used to measure drug consumption in children, since the dose recommendations for use in children vary according to age and body weight. The DDD is the assumed average maintenance dose per day for a drug in its main indication for adults and is commonly expressed with a certain population size denominator such as patient days, bed days, admission days, inhabitant days (http://www.whocc.no/filearchive/publications/2010guidelines.pdf.). The popularity of the DDD mainly originates from its general applicability and its advantage that comparison of the amount of drug use between different (international) settings and between different drugs based on grouped dispensing data is possible, without requiring utilisation data on the individual patient level. Based on the narrow range of body weights in the neonatal population, the investigators have recently developed a set of neonatal DDDs for antibiotics (Liem et al. 2010), however no studies using this method were currently identified.

The limitations of using prescription rate as a measure of drug exposure is the lack of information on the OTC medicines use.

According to a recently published literature review, the methodological quality of the paediatric drug utilisation studies is rather low. Of the 22 studies, all evaluating drug prescriptions published between 1994 and 2008, 10 reported the prevalence of drug prescriptions and 16 reported the number of prescriptions and/or medication packages. Only 12 studies reported the prevalence or the prescriptions of the most commonly prescribed therapeutic subgroup and 5 reported the prevalence of the most commonly prescribed drugs. All studies defined age groups in different ways, and there was no consistency in the choice of groups. The standard deviation (SD) was reported in 5, the range of values in 6, the 95 % CI in 5, and the median in 4 studies. Statistical analyses were performed in only 12 studies. Only in five of the 18 studies in which the mean was used was the SD also reported (Sequi *et al.* 2012).

In recent years, national and regional prescription and health maintenance organisation databases have been most commonly used in paediatric pharmacoepidemiological studies followed by data collected from physicians and questionnaires administered to parents (Sequi *et al.* 2012).

Claims databases are used in the US and health care databases in Europe. Health care databases consist of pharmacy, primary care and hospital databases (Verhamme & Sturkenboom 2011). Neubert *et al.* evaluated all of the 16 population-based European healthcare databases listed on the website of International Society of Pharmacoepidemiology (ISPE) and 9 databases known by

the members of the Task-force in Europe for Drug Development for the Young (TEDDY) pharmacoepidemiology expert group which could be used for paediatric medicines research. They found that all databases that participated in the survey collect information about prescription drugs and the units dispensed or prescribed, most of them also record the dosage regimen and are therefore particularly useful for studying drug utilisation (Neubert *et al.* 2008a).

#### 2.2.2. Paediatric drug utilisation studies in practice

A great number of paediatric drug utilisation studies are conducted and published worldwide, however few have been focused on the use of medicines in neonates. For example, of the 128 paediatric drug utilisation studies published between 1994 and 2008, only 21 were analysing all of the drug groups and of these in turn only 11 evaluated drug prescriptions in the entire paediatric population, with 3 involving only infants (Clavenna & Bonati 2009). However, as a result of the increasing number of OL medicines use studies in neonatal units, the neonatal medicines use pattern of recent years has been relatively well described.

Most of the studies have been focusing on a specific drug class, most commonly on psychotropic medicines (46% of studies) and antibiotics (30%). Also great heterogeneity exists regarding the study types and parameters such as study methodology (e.g. prospective vs. retrospective study), population (sample size, age group) or setting (outpatient or hospitalised children, general practice or specialised unit, certain regional area) making the results of the studies hardly comparable (Clavenna & Bonati 2009).

Furthermore, markedly different data have been collected in trials excluding for example standard intravenous replacement solutions, blood products, oxygen therapy (Conroy *et al.* 1999), topical anaesthetic creams (Turner *et al.* 2009), drugs given via nebulisation or ear, eye and nose drops (Jain *et al.* 2008).

**Ambulatory practice.** The prescription prevalence rate in the paediatric ambulatory practice has been ranging from 51% in Denmark and Sweden to 70% in Greenland, and the prescription rate from 0.8 in Norway to 3.2 in the US (Clavenna & Bonati 2009, Olsson *et al.* 2011). Drug use has been the highest among infants decreasing until adolescence (Schirm *et al.* 2000).

Most commonly prescribed drug groups were systemic antibiotics, respiratory system medicines, analgesics, dermatologicals and ophthalmologicals (Mühlbauer *et al.* 2009, Schirm *et al.* 2000, Straand *et al.* 1998, Sturkenboom *et al.* 2008, Thrane & Sørensen 1999) while the most frequent active ingredients were amoxicillin, paracetamol, cetirizine and salbutamol (Bazzano *et al.* 2009, Morales-Carpi *et al.* 2010).

**Mixed paediatric population in the hospital, including neonates.** The median number of prescriptions per patient was from three (Pandolfini *et al.* 2002, t Jong *et al.* 2002) to six (Santos *et al.* 2008) ranging from 1 to 18. Similarly to

ambulatory prescribing pattern, the mean number of medications was higher in children <1 year old compared to other age groups (Santos *et al.* 2008).

The major therapeutic subgroups prescribed were the same as in the ambulatory practice – antibacterials for systemic use, respiratory system medicines and analgesics/antipyretics (Pandolfini *et al.* 2002, Santos *et al.* 2008).

The list of most frequently used active ingredients was more heterogeneous than in ambulatory practice, the most commonly used medicines being vitamin D, paracetamol, amoxicillin, beclomethasone, fluconazole, cefotaxime, caffeine, prednisolone, benzylpenicillin and nystatin (Hsu & Brazelton. 2009, Lindell-Osuagwu *et al.* 2009, Palčevski *et al.* 2012, Pandolfini *et al.* 2002, Santos *et al.* 2008).

**Hospitalised neonates** received a median number of three to four (Lindell-Osuagwu *et al.* 2009, Nguyen *et al.* 2011, Oguz *et al.* 2012) to 8.5 medicines (Kumar *et al.* 2008) ranging from 0–132.

Of all patients 72.5% (Palčevski *et al.* 2012) up to 99% (Neubert *et al.* 2010) received at least one drug during the hospitalisation.

According to the ATC classification system again antiinfectives for systemic use were prescribed most often followed by the central nervous system and respiratory system medicines (Neubert *et al.* 2010).

Most commonly used active ingredients were ampicillin, gentamicin, caffeine, paracetamol, cefotaxime, heparin, vitamins D and K, salbutamol, furosemide, dopamine, midazolam and benzylpenicillin (Clark *et al.* 2006, Hsu & Brazelton 2009, Kumar *et al.* 2008, Neubert *et al.* 2010, O'Donnell *et al.* 2002, Oguz *et al.* 2012, t Jong *et al.* 2001).

To conclude, the uniform methodology or large international studies could give more comparable data on the paediatric and neonatal medicines use pattern.

# 2.3. Off-label (OL) and unlicensed (UL) use of medicines in children

#### 2.3.1. Definitions

One of the first definitions of OL/UL use of medicines was published more than 10 years ago (Turner *et al.* 1998) and later used in modified version. This defines OL use as use of a drug in situations not covered by the product license (e.g. administration of a greater dose or more often, administration for indications not described in the license, administration to children outside the age range for which the product is licensed, the use of alternative routes of administration, and use when the product is contraindicated). The UL use is defined as modifications to licensed drugs, drugs that are licensed but the particular formulation is manufactured under a special license, new drugs available under a special manufacturing license (such as caffeine injections for

apnoea of prematurity), use of chemicals as drugs, drugs used before a license has been granted, and imported drugs.

Turner's definitions were soon abandoned, probably due to the practicalities depending on the study methodology. For example as it is complicated to evaluate the real intake of medicines prescribed to ambulatory patients, it is also difficult to determine whether these drugs are used for licensed indications or in a licensed dose (McIntyre *et al.* 2000, Olsson *et al.* 2011).

In earlier drug utilisation studies generally broader definitions for OL were used, e.g. a drug use was classified OL if the dose, dosing frequency, or the age/weight of the patient was not in agreement with the labelling. In more recent studies, OL was mostly defined as a result of the lack of paediatric information and the use of a non-approved dose in relation to age (Kimland *et al.* 2012).

To overcome the unclarity around the terminology a Delphi survey was conducted in 2005 to develop shared definitions for UL/OL drug use in children to be used for research and regulatory purposes (Neubert *et al.* 2008b). The following definitions were created:

- OL use: all paediatric uses of a marketed drug not detailed in the SPC with particular reference to therapeutic indication, therapeutic indication for use in subsets, appropriate strength (dosage by age), pharmaceutical form and route of administration.
- UL use: all uses of a drug, which has never received a European MA as medicinal for human use in either adults or children.

A widely acceptable definition on the OL/UL use of medicines was still not agreed to extend to an international level (i.e. ICH—International Conference on Harmonisation) as the EMA opinion was that there is no need to do so from the regulatory point of view (Neubert *et al.* 2008a).

No uniform definitions across the studies exist for OL/UL medicines use making comparisons between studies very difficult if not impossible. As shown in Table 3 the OL and UL definitions are also overlapping. For example when adult medicine is modified (e.g. tablet is crushed) or when no paediatric dosage is available, medicines have been classified both – OL or UL. The list of definitions used in previous studies reveals many similarities but also crucial differences.

The OL use has been itself divided further to the OL with strong scientific support, and OL with limited or no scientific support (Radley *et al.* 2006). Some studies have not distinguished between OL and UL categories (Neubert *et al.* 2008b), some have abandoned the OL/UL definitions and assess the age-appropriateness of medicines (dose capability, suitability of the dosage form and inclusion of potentially harmful excipients) finding that paediatric medicines may not be age-appropriate, even if authorised (van Riet-Nales *et al.* 2011).

**Table 3.** Variability of definitions used by investigators while describing UL/OL prescribing

Category	OL category consists	Reference
	D, F, I, A, RA, CI	(Turner et al. 1998)
	D, F, I, A, presentation*	(Carvalho et al. 2003)
	D, I, A, RA, CI, inadvisable co-prescription	(Horen et al. 2002)
	D, F, I, A, RA, formulation modification	(Pandolfini et al. 2002)
OL	D, F, I, A/weight, RA, CI, dosage form	('t Jong et al. 2002)
OL	A, D, RA	(Bajcetic et al. 2005)
	A	(McKinzie et al. 1997,
		Pasquali et al. 2008,
		Shah et al. 2007)
	Clinically accepted OL indications	(Volkers et al. 2007)
	Formulation modifications, manufactured under special license,	(Conroy et al. 1999,
	use of chemicals as drugs, used before a licence has been	Turner et al. 1998)
	granted, imported drugs licensed for use in another country but	
	not in UK	
	No MA	(Tuleu et al. 2010)
	No MA, formulation modification, extemporaneous	(Tuleu C. 2007)
UL	No MA, not recommended in children	(Serreau et al. 2004)
UL	Formulation modification	(Gavrilov et al. 2000)
	Formulation modification, CI, no paediatric dosage	('t Jong et al. 2002)
	Not approved for use in children, CI, no paediatric dosage	(Carvalho et al. 2003)
	'Unlicensed' for age	(Volkers et al. 2007)
	CI, extemporaneous, safety / efficacy in children not established	(Santos et al. 2008)
	Extemporaneous, drugs used as "special" formulations, without	(DellAera et al. 2007)
	license	

MA, marketing authorisation; D, dose; F, frequency; I, indication; A, age; RA, route of administration; CI, contraindication

#### 2.3.2. Extent of OL/UL use of medicines

As mentioned above the OL/UL prescribing has been extensively studied though mainly in Western Europe and US. According to the Neubert *et al.* a total of 66 publications relating to OL/UL drug use in children were identified from PubMed database between 1995 and 2005 (Neubert *et al.* 2008b).

Pandolfini *et al.* published a first systematic review of OL/UL use studies in 2003. They compared paediatric OL/UL drug use in seven European countries and across different settings such as neonatal and paediatric hospital wards and community setting. The OL/UL drug prescribing rates ranged from 19% of patients in community setting to 97% in neonatal wards, and from 11% to 80% prescriptions, respectively (Pandolfini & Bonati 2003).

A review article by the same authors published two years later included 30 studies from Medline and Embase from 1985–2004. Eleven studies involved paediatric hospital wards, seven neonatal hospital wards, and twelve the community setting. Most of the studies (21/30) were prospective. Similar OL/UL prescription rates were described as in their previous review – from

<sup>\*</sup>OL presentation – prescribers were not aware, that they are using a low viscosity paracetamol formulation (1ml = 30 drops) as best known product on the market is 1ml = 16-20 drops. Paracetamol was prescribed as though there were 20 drops / ml, leading to under-prescription of up to 50% less than intended

11% to 80%. The proportion of patients receiving at least one OL/UL drug on the neonatal wards was much higher than in the paediatric wards and ranged from 80% to 97% vs. 36 to 92%. The rates of OL/UL prescriptions in the community varied from 55% to 80% (Pandolfini & Bonati 2005).

Cuzzolin *et al.* published a review article in 2006. They identified 52 studies conducted between 1990 and 2006 assessing the OL/UL use of medicines from Medline and Embase database. Again the extent of paediatric UL/OL use was found to be higher in neonatal, paediatric intensive care and oncology wards, compared with primary care. OL/UL use ranged from 3.3 to 56% of prescriptions in community practice to 36 to 100% in hospital settings (median 40%) (Cuzzolin *et al.* 2006).

The most recent review by Lindell-Osuagwu *et al.* describes the OL/UL drug use in hospitalised children. Data were retrieved through electronic searches of Medline and International Pharmaceutical Abstracts. They included 24 studies from 12 different countries and found the proportion of children with at least one prescription for OL/UL drug ranging from 36 to 100%, including OL prescriptions rate from 18 to 60% and of UL prescriptions rate from 0 to 48%. Again UL/OL prescription rate was higher in neonates and small infants as compared with all children (98% vs. 88%, respectively) but the differences between these two groups were not as pronounced compared to the previous reviews (Lindell-Osuagwu *et al.* 2009).

With the literature review using Google scholar and Medline database with the search terms "off-label", "unlicensed", "children", "neonates" in May 2012 altogether 40 studies on the hospitalised children (including 7 in the neonatal wards) and 17 ambulatory OL/UL medicines use study performed between 1997 and 2012 were identified (Tables 4 and 5). Only studies in which the rates of OL/UL medicines use were reported were included. Again the OL use was higher in the hospital setting (median 35% in mixed population including neonates, 40% excluding neonates and 49% in pure neonatal studies) compared to median of 20% in the ambulatory studies. In contrast, more UL prescriptions were issued in the ambulatory setting (median 16%, range 0.3–17%) than in the hospital (median 9% in mixed population studies excluding neonates and median 12% in both – neonatal studies and mixed population studies including neonates). Studies have been mainly conducted in industrialised countries and seldom in low- or middle-income countries including Eastern Europe. Of the 20 countries where hospital-based OL/UL use has been studied, UK predominates with 8 studies, followed by The Netherlands (5 studies), Germany and Italy (4 in both) and Israel (3 studies). In other countries two or less hospital based OL studies have been conducted and published.

Compared to the hospital-based OL use studies the ones in ambulatory setting have been conducted even in few countries. As shown in Table 5 of eight countries again The Netherlands (4 studies) and UK (3 studies) prevail, followed by France, Germany, Sweden and United States (2 studies in each) and 1 in Italy and Spain. No studies originate from Eastern Europe or from the developing world.

Table 4. Review of the OL/UL rate studies in paediatric and neonatal hospital wards

		1		-					
Reference/ country	Methodology, study duration	Paediatric wards / patients	Patients (n)	Age	Pre- scriptions (n)	% % 1 TO	UL Patients % receiving OL/UL %		Most common reason for OL/UL
Mixed population studies including	including neonates								
Sn	R	Emergency	359	<18y	NR	NR N	NR 43	Age	e
(McKinzie et al. 1997)	1 m			•					
NM	Ь	Medical, surgical	609	4d-20y	2013	18.2 6	6.9 36	Age	e
(Turner et al. 1998)	13 w								
UK	Ь	Surgical, medical,	1046	1d-18y	4455	35 OL or UL	JL 48	NR	
(Turner et al. 1999)	13 w	neonatal surgical,							
		cardiac intensive							
UK, Sweden, Germany,	Ь	General	624	4d-16y	2262	39 7	29		
Italy, the Netherlands	4 w			•				Do	Dose and frequency
(Conroy et al. 2000)									
The Netherlands	Ь	Medium-care,	238	0 - 17y	2139	18 N	NR 92	Mo	Modification
(t Jong et al. 2000)	5 w	Intensive-care							
The Netherlands	Ь	Paediatric, PICU	237	0 - 17y	2139	18 4	48 90% of	Dose	se
(t Jong et al. 2001)	5 w						patient-days contained UL	days ed UL	
							drugs or OL prescription	OL	
The Netherlands	Ь	Paediatric,	293	0-16.7y	1017	44 2	28 92		OL: dose/frequency
(t Jong et al. 2002)	19 w	neonatology						UL	UL: modification
UK	R	Gastro-	308	20d-17y	<i>LLL</i>	37 1	12 NR	TO	OL: indication
(Dick et al. 2003)	Over 6 m	enterology outpatient						Tin	UL: modification
Israel (Gavrilov <i>et al.</i> 2003)	R and P 3 and 4 m	PICUs	158	6d-18y	874	40 4	41 83	Age	e
(2)	0	Laclation	170	5.3 175.	077		Т	V	
Germany	٦, ٥	Isolation	1/8	2d-1 /y	/40	0 97	0.4	Age	မ
(Neubert <i>et al.</i> 2004)	8 m								

Reference/ country	Methodology.	Paediatric wards /	Patients	Age	Pre-	OF	UL	Patients	Most common
	study duration	patients	(n)	)	scriptions	%		receiving	reason for
					(n)			OL/UL %	OL/UL
Serbia and Montenegro	Ь	Cardiology	544	1d-18y	2037	47	11	92	Dose
(Bajcetic <i>et al.</i> 2005)	2 y								
Switzerland	Ь	NICU, PICU,	09	3d-14y	483	25	24	100	Lack of information
(Di Paolo et al. 2006)	e m	intermediate care,							
		medical, surgical							
NS	Ь	General,	403	3d-18y	1383	31	NR NR	31	Indication
(Eiland & Knight. 2006)	6 m	emergency, PICU							
Sn	R	Paediatric tertiary	355409	<18y	NR	NR	NR	62	Age
(Shah <i>et al.</i> 2007)	1 y	care hospitals							
Germany	Ь	Paediatric	417	1d-40y	1812	31	0	61	Age
(Hsien <i>et al.</i> 2008)	e m			•					•
US (Pasquali et al. 2008)	R	Database,	31 432	<18y	NR	69	NR	78	Age
	1 y	inpatients, tertiary							
		care paediatric							
		hospitals							
Finland	Ь	NICU, general,	141	<18y	629	36	13	63 - 91	Lack of information
(Lindell-Osuagwu <i>et al.</i> 2009)	2	surgical							
UK, Italy, Greece	Ь	NICU, general	919	<17y	1244	4.1	NR	NR	Dose
(Porta <i>et al.</i> 2010)	2 w					NICU 1.7			
Canada	8	NICU, PICU,	227	0 - 15y	3391	09	NR.	66-68	Lack of information
(Doherty et al. 2010)	1 m	operating							
		room/post-							
		anaesthetic care							
Palestine	Ь	4 paediatric wards	387	<18y	917	35.3	7.1	49.6 OL	NR
(Khdour et al. 2011)	5 w	(NICU, medical						10.1 UL	
		and surgical ward)							

Reference/ country	Methodology, study duration	Paediatric wards / patients	Patients Age (n)	Age	Pre- scriptions (n)	% 70	nr N	Patients receiving OL/UL %	Most common reason for OL/UL
Croatia (Palčevski <i>et al.</i> 2012)	P 1 d each month during a 12 m period	Paediatric department	691	1d-20y	1643	13	12	48	ΝΑ
Sweden (Kimland et al. 2012)	R two separate 2-day-periods	41 hospitals	2947	<18y	11294	41	NR	09	Lack of information
Neonatal studies									
UK	Ь	NICU	70	Neonates 455	455	54.7	6.6	06	Dose
(Conroy et al. 1999)	13 w				prescripti on episodes*				
Israel (Barr <i>et al.</i> 2002)	P 4 m	NICU	105	Neonates	525	65	16	93	Dose
Australia	Ь	NICU	26	Infants	1442	47	11	80	Indication /
(O'Donnell et al. 2002)	10 w								extemporaneous preparation
Italy	Ь	NICU	34	Neonates 176	176	51	12	88	Lack of information
(DellAera <i>et al.</i> 2007)	2 m								
Germany (Neubert <i>et al.</i> 2010)	P 11 m	NICU	183	Neonates	1978	28	9	70 (100 for very preterm)	Lack of information
France (Nguyen <i>et al.</i> 2011)	P 4 m	Neonatal	65	Neonates	265	30	17	71	Age
Turkey (Oguz <i>et al.</i> 2012)	P 24h	NICUs	464	Neonates 1315	1315		29	48 – 63	OL: Lack of information
									UL: modification
Studies excluding neonates									
Australia	Ь	Surgical and	200	49d-18y	735 drug 16%	16%		36	OL: age
(Turner. 1999)	5 w	general			episodes†	OL UL			
						1			

Reference/ country	Methodology,	Paediatric wards /	Patients Age	Age	Pre-	OT		Patients	Most common
	study duration	patients	(n)	)	scriptions	%	%	receiving	reason for
					(n)			OL/UL %	OL/UL
Israel (Gavrilov <i>et al.</i> 2000)	R 2 m	General ambulatory 132	132	1m-18y	222	26	8	42	Dose
Italy (Pandolfini <i>et al.</i> 2002)	P 12 w	General	1461	1m-14y 4265	4265	09	0.2	68	Dose
Brazil (Carvalho <i>et al.</i> 2003)	P 6 w	PICU	51	1m-13y	747	49.5	10.5 100	100	Dose
UK	Ь	Oncology	51	0.6y-	695	26	19	100	OL: Dose
(Conroy et al. 2003)	4 w	ı		16.3y	prescripti on episodes*				UL: Modification
France (Serreau et al. 2004)	P 6 m	Psychiatry	336	3y-15y	295	25	23	NR	OL: contraindicated UL: not recommended for children
India (Jain et al. 2008)	P, 2 m	General	009	1m-12y	2064	50.6	NR	06	Dose
Brazil (Santos et al. 2008)	P, 5 m	General	272	1m-16y 1450	1450	40	5.5	82	OL: Dose / frequency
The Netherlands (van den Berg & Tak 2011)	P, 2 w	Oncology	39	0.25y- 17y	268	43	1	87 UL	NR
Population not specified									
UK	Ь	Acute medical and	NR	NR	715	33%	%0	NR	Dose
(Conroy & Peden. 2001)	4 w	Surgical			prescripti on episodes*				
Northern Ireland	P	Non-specialised	32	NR	237	19.4	3.4	NR	NR
(Craig <i>et al.</i> 2001)			1016					 -	. 11010 '.
NICII neonatal intensive-care		intensive care unit	- L H	Sectiatric	intensive C	are mut.	≥	mediim ca	mult: I(\  intensive care mult: PI(\  naediatric intensive care mult: M(\  medium care mult: SI(\  surgical

NICU, neonatal intensive-care unit; ICU, intensive care unit; PICU, paediatric intensive care unit; MCU, medium care unit; SICU, surgical intensive care unit; P, prospective; R, retrospective; d, day; y, year; m, month; w, weeks; NR, not reported \*Prescription episodes: each episode being a course of a drug or a single one off dose. † Drug episodes: the sum of the number of different drugs administered during each patient admission.

Table 5. Review of the OL/UL studies in the community setting

Reference	Methodology, data	Prescribers	Patients (n)	Age of	Prescriptions	%TO	%TO	OL% UL% Patients	Main reason
	source, study period			patients	(n)			receiving OL/UL%	for OL/UL
UK (McIntyre <i>et al.</i> 2000)	R, electronic prescribing system, 1v	Single suburban GP	1175	< 12y	3,347	10.5	0.3	N. R.	Dose
France (Chalumeau et al. 2000)	P, survey, 1d	77 office- based paediatricians	686	2d-15y	2,522	29	4	56	Age
Germany (Bucheler et al. 2002)	R, electronic database,	6886 office based doctors	455 661	0–16y	1.74 million	13.2	NR	NR	Lack of information
The Netherlands (Jong et al. 2002)	Population based cohort, electronic database, 1y	150 GP	13 426	0–16y	17,453	13.6	15.3	NR	Lack of information
The Netherlands (Schirm & Tobi 2002)	Cross-sectional, prescription database	NR	19 283	<16y	68,019	22.7	16.6	NR	Lack of information
France (Horen <i>et al.</i> 2002)	P, 4m	39 office- based physicians	1419	<16y	NR	18.9	NR	42	Indication
The Netherlands (Schirm et al. 2003)	Cross-sectional, pharmacy dispensing records, 1y	NR	18 943	<16y	66 222	20.6	16.6	NR R	NR
Sweden (Ufer <i>et al.</i> 2003a)	R, electronic prescription database, ly	NR	NA	<16y	575526 prescription items	20.7	NR N	NR	NR R
The Netherlands (t Jong et al. 2004)	P, population-based cohort study, GP	GP	13426	<16y	5253	20.3	16.8 NA	NA	OL: Dose UL:

ر	3.6 (1 1 1 1 )	:		•		) TO	111 0/		. 31
Keterence	Methodology, data	Prescribers	Patients (n)	Age of	Prescriptions OL% UL% Patients	%TO	%TO	Patients	Main reason
	source, study period			patients	(n)			receiving OL/UL%	for OL/UL
	practice database, 1y								Modification
Scotland	Electronic	161 GP	167865	<16y	NR	NR	NR	26	Dose
(Ekins-Daukes et al.	questionnaire,	practices							
2004)	$_{1y}$								
Italy	P,	GP practices	9917	<12y	8476	17	NR	17	Indication
(Pandolfini et al. 2005)	13 weeks								
Sn	P, survey,	NR	NR	NR	725 million	21	NR	NR	Ţ
(Radley <i>et al.</i> 2006)	1y				drug men-				
					tions among				
					sampled				
					drugs				
NM	P, periods	1188 GP	17 163	<16y	NR	NR	NR	6.1	Dose
(McCowan <i>et al.</i> 2007)	between 2001- 2004	practices		ı					
Sn	R,	Health care	4317	<18y	19109	20	NR	42 to 53%	OL: Age
(Yoon et al. 2007)	1y	utilisation			prescription				
		database			claims				
Germany	R,	Health	Approximately	<16y	1429981	3.2	NR	NR	NR
(Mühlbauer et al. 2009)	Prescription	insurance fund	289000						
Spain	P.	Ouestionnaire	462	<14v	299	51	NR	89	OL: Dose /
(Morales-Carpi et al.	14m	in the hospital		,					frequency
2010)		emergency							
		room							
Sweden	R,	Swedish	968 465	<18y	2.19 million 13.5 NR	13.5		NR	OL: Lack of
(Olsson <i>et al.</i> 2011)	Prescription	Prescribed							information
	database,	Drug Register							
	1y								

P, prospective; R, retrospective; Y, year; m, month; NR, not reporte

#### 2.3.3. OL use according to the therapeutic groups and products

Drug groups with the highest percentages of ambulatory OL use have found to be varying. These include cardiovascular medicines (Olsson *et al.* 2011, Radley *et al.* 2006), urologicals or sex hormones (mainly oral contraceptives) (Olsson *et al.* 2011, Schirm & Tobi 2002), ophthalmologicals/otologicals (Schirm *et al.* 2003), antidepressants (Lee *et al.* 2011, Volkers *et al.* 2007) and more specifically selective serotonin reuptake inhibitors (SSRIs) (Martin & Conroy. 1998), hypnotics (e.g. melatonin) and drugs for the musculoskeletal system (mainly non-steroidal anti-inflammatory drugs, NSAIDs) (Olsson *et al.* 2011) or respiratory medicines (Morales-Carpi *et al.* 2010, t Jong *et al.* 2004). It has been found that sixty percent of antidotes and poison treatment agents of children do not correspond to the demands of licensing systems (Lifshitz *et al.* 2001).

Often used OL products found in published neonatal studies are benzylpenicillin (Conroy *et al.* 1999, Nguyen *et al.* 2011), amikacin (DellAera *et al.* 2007, Nguyen *et al.* 2011), furosemide, metoclopramide, fentanyl, salbutamol, paracetamol (Carvalho *et al.* 2003), ranitidine, tobramycin (DellAera *et al.* 2007), morphine, theophylline and aminophylline (O'Donnell *et al.* 2002).

#### 2.3.4. What problems may OL/UL use of medicines cause?

The OL use of medicines is legal and sometimes the best practice. An example is the recommended use of gentamicin in the combination with ampicillin or penicillin in the empirical treatment of neonates at risk of early onset neonatal sepsis (Metsvaht *et al.* 2010) despite the lack of neonatal drug information in the Estonian SPC of gentamicin. The use of UL is neither illegal. The Article 5.11 of Directive 2001/83 allows using an UL medicinal product to meet the special needs of an individual patient under the direct personal responsibility of prescriber.

Real negative effects of OL/UL use of medicines have hardly been demonstrated in clinical practice or trials. Still, the suspected problems associated with OL/UL use of medicines are the following:

- Lack of suitable paediatric formulation (Tuleu *et al.* 2010) leading to non-compliance and potential for treatment failure;
- Lack of licensed paediatric doses, varying dose ranges in different drug information sources (Ceelie *et al.* 2010) leading to medication errors (Conroy 2011). There was for example underdosing of antiretrovirals in the UK partly attributable to confusing and inconsistent dosage strategies, failure to increase the dose with increases in height and weight or rounding down of doses, limitations in formulation (Menson *et al.* 2006).
- Lack of long-term safety and efficacy data (Stewart et al. 2007), risk of ADRs probably increased while OL medicines were used (Santos et al. 2008);

- Continuity of care after discharge from hospital availability of OL/UL medicine in a public pharmacy once the patient is discharged, no reimbursement (Di Paolo *et al.* 2006, Wong *et al.* 2006);
- Concerns about the quality of UL product and compliance with Good Manufacturing Practice (GMP) by the manufacturer;
- Adequacy of the patient information the language in package inserts of UL drugs is usually not the same as the official language in the country (Di Paolo et al. 2006);

Still, despite the aforementioned problems, there are currently large gaps in our understanding of how OL use affects children in real life situations (Smith *et al.* 2012).

Adverse drug reactions (ADRs) in children are a significant public health issue and have been associated with OL prescribing as shown by the prospective surveillance study in paediatric inpatients over a 9-month period. The OL prescriptions were responsible for 38% of inpatient ADRs and for 42% of the ADRs occurring in the community that led to hospitalisation. Urticaria, vomiting, rash and tremor were the most common ADRs. Eight ADRs (20%) were classified as severe (Impicciatore *et al.* 2002).

Horen *et al.* investigated the potential relationship between OL drug use and increased risk of ADRs in paediatric outpatients in France with a prospective survey of drug prescribing in office-based paediatricians. They found that the relative risk of ADRs with OL drug use was 3.44 (95% CI 1.26, 9.38), particularly when it was due to an indication different than that defined in the SPC (relative risk 4.42; 95% CI 1.60, 12.25) (Horen *et al.* 2002).

Ufer *et al.* investigated the extent and characteristics of OL prescribing for paediatric outpatients among drugs reported to have caused an ADR with a retrospective, cross-sectional, observational analysis of spontaneous ADR reports in Sweden in the year 2000. They identified 112 patient-linked reports corresponding to 158 ADRs of which 31% were serious. OL drug prescribing was 42.4% and it was more frequently associated with serious than non-serious ADRs and mostly due to a non-approved age or dose (Ufer *et al.* 2004).

Aagaard *et al.* analysed spontaneous ADR reports for children submitted to the Danish national ADR database from 1998 to 2007 with the aim to identify ADRs associated with OL prescribing. Of the 4388 of reported ADRs 17% were associated with OL use, 60% of them were serious. More than half of OL ADRs occurred in adolescents and serious ADRs due to OL prescribing were more likely to be reported for hormonal contraceptives, anti-acne preparations and allergens (Aagaard & Hansen. 2011).

Still, despite the generous amount of publications relating the OL use with ADRs and the magnitude of the risk remains unclear (Smith *et al.* 2012). A recent review concluded that although the results of previous studies have indicated that there may be some association between OL/UL medicine use and ADR risk there is still a lack of clarity (Mason *et al.* 2012).

#### 2.3.5. Data sources for paediatric medicines information

As there is often a lack of paediatric data in official drug information sources such as the SPC, the information necessary for treating children is retrieved from paediatric textbooks, national formularies, guidelines etc. Differences in preference of drug information source exist between countries, hospitals, and even between physicians in the same institution (Kemper *et al.* 2011). For example, British community pharmacists most often use the British National Formulary (BNF) or the package insert leaflet for getting the paediatric medicines information rather than specialist formularies or guidelines (Stewart *et al.* 2007).

Different source documents have also been used to classify medicines into the OL category by investigators as shown in Table 6. The availability and reliability of paediatric drug dosing guidelines in medicines information sources varies.

**Table 6.** Source documents used by investigators for categorising medicines into OL/UL

Source	Description	Author(s) / reference
Official drug		(Hsien et al. 2008, Jong et al. 2002,
information	SPC	McIntyre et al. 2000, Mühlbauer et al.
		2009, Schirm & Tobi 2002)
	USP DI 2001	(Carvalho et al. 2003, Yoon et al. 2007)
	Swedish catalogue of	(Kimland et al. 2007)
	medical products	
	(FASS)	
Official drug	Micromedex database	(Carvalho et al. 2003, Yoon et al. 2007)
information		(Conroy et al. 1999, Conroy et al. 2003,
combined with the		Dick et al. 2003, Jain et al. 2008,
expert opinion	BNFC	McCowan et al. 2007, McIntyre et al.
		2000, Porta et al. 2010, Turner et al.
		1998, Turner 1999)
National	The Association of the	(Conroy et al. 1999, Conroy et al. 2000,
compendiums	British Pharmaceutical	Conroy et al. 2003, Dick et al. 2003,
(product licenses summarised)	Industry's data sheet compendium	Turner et al. 1998, Turner 1999)
	Repertorium (Dutch)	(Conroy et al. 2000, t Jong et al. 2000)
	Rote Liste (Germany)	(Conroy et al. 2000, Hsien et al. 2008, Mühlbauer et al. 2009)
	Israel Drug	(Gavrilov et al. 2000)
	Compendium	,
	Vidal (French)	(Chalumeau et al. 2000, Serreau et al. 2004)
	Swiss Drug	(Di Paolo et al. 2006)
	Compendium	
Package insert		(Conroy et al. 1999, Conroy et al. 2003,
-		Di Paolo et al. 2006, Gavrilov et al. 2000,
		McIntyre et al. 2000, Porta et al. 2010,
		Turner et al. 1998, Turner 1999)
		<u> </u>

Source	Description	Author(s) / reference
National	Informatore	(Conroy et al. 2000, Porta et al. 2010)
formularies	Farmaceutico (Italy)	
	Greek National	(Porta et al. 2010)
	Formulary	
	Sweden	(Conroy et al. 2000, Ufer et al. 2003a)
Physician's Desk	Israel	(Gavrilov et al. 2000)
Reference	Paediatric drug	(Conroy et al. 2003)
	reference book	
	Medicines for Children	

SPC – Summary of product characteristic

#### Description of different information sources:

- SPC: a legal document approved as part of the marketing authorization (MA) and its information is updated throughout the life cycle of the product as new data emerge. The drug manufacturer submits a dossier to the Medicine Competent Authority with a proposed SPC. A limitation of the SPC is that the data included is from the individual companies proposal to the regulatory authorities. The indications that are not claimed by the manufacturer are not included into the SPC.
- Micromedex database (including NeoFax database for neonatal medicines): contain both FDA-approved or "labelled" indications as well as unapproved or "off-label" indications for drug therapy which are the result of ongoing review and recommendations from the worlds' medical journals by the experts (http://www.micromedex.com/ evidence/). Smith *et al.* examined further the drugs without FDA-labelling for paediatric use to identify the strength of the evidence behind each indication according to the Micromedex website. They found that 41.7% of drugs have indications for which the strength of evidence is category C, meaning the evidence for use in paediatric patients is based on expert opinion, consensus, case reports, or case series, but not clinical trials (Smith *et al.* 2012). Similarly, Yoon et al. found that 27% of all drugs listed in the expert opinion-based Harriet Lane Handbook were not approved by the FDA for use in children (Yoon *et al.* 2006).
- BNF and BNFC: use a variety of sources for its information such as SPC, expert advisors, systematic literature review (staff editors monitor core medical and pharmaceutical journals, databases including the Cochrane Library and various web-based resources), consensus guidelines, textbooks and reference sources, statutory information, comments from readers and industry. Expert advisers provide an opinion in areas of controversy or when reliable evidence is lacking and advise on areas where BNF diverges from SPC (http://www.bnf.org/bnf/org\_450015.htm).

<sup>\*</sup>Of the 30 studies conducted from 1998 to 2012, in 6 the manufacturer was contacted, 1 to 8 sources were used for classification drugs OL, 11 used only one source.

An alarming difference in paediatric drug information in different sources is described (Hsu & Brazelton 2009) affecting the prescribing of medicines to children in different countries and settings. Significantly less prescriptions for hospitalised children were classified OL according to the two contemporary paediatric reference formularies (Lexi-Comp Pediatric Dosage Handbook and the Hospital for Sick Children Handbook and Formulary, and France's Dictionnaire Vidal) compared to the official Canadian Compendium of Pharmaceutical Specialties (Doherty *et al.* 2010). Almost two thirds of the drugs prescribed to the Turkish neonates were UL/OL according to national database and only 48% according to paediatric dosage handbook (Oguz *et al.* 2012).

Ceelie *et al.* assessed the availability of paediatric information in 4 information sources for all the prescribed drugs in 2 ICUs in the Netherlands in 2005 and 2006. For 34.7% of drugs the daily dosing recommendations differed by >100% compared with the formulary for the lowest daily dose to the highest daily dose. For 61% of drugs, dosing recommendations differed between formularies, whereas for 53.4%, the dosing regimen guidelines differed. The dosing guidelines for the three most prescribed drugs (paracetamol, midazolam, amoxicillin/clavulanic acid) were provided in all formularies and were largely in agreement. At the same time for some of the rarely prescribed drugs such as iloprost, no dosing information was given in any of the sources used (Ceelie *et al.* 2010).

### 2.4. Pharmaceutical excipients

In addition to active ingredients, most drug formulations contain pharmaceutical excipients. Excipients aid the manufacturing of the medicinal product and the administration to patients. They are used in medicines as tablet fillers, diluents and solvents, emulsifiers, binders, lubricants, glidants, disintegrants, sweeteners, preservatives and stabilising, flavouring or colouring agents etc. (Rowe *et al.* 2009).

Excipients are defined as substances other than the active ingredients, which have been appropriately evaluated for safety and are intentionally included in a drug delivery system (IPEC Europe. 2008). Their use is regulated by several documents. According to European guidelines (EMA. 2009), all excipients, which are present in the product, should be listed in the SPC, even those present in small amounts. In the United States the FDA has published a list entitled "Inactive Ingredient Guide" for excipients that have been approved in the marketed products providing also the relevant maximum dosage levels by route of administration or dosage form (FDA. 2010). WHO has also set an acceptable daily intake for several excipients, but despite the recommendation, the amount of excipients in the drug formulations has rarely reported in the SPCs. The description of excipients in the SPC is either always sufficient to evaluate the potential safety of the drug product. For example "orange aroma" could consist of 23 different substances, including benzyl alcohol (http://www.theriaque.org/

apps/recherche/rch\_simple.php#) used as a solvent, which could vaporise during the manufacturing but may also stay in the medicinal product as a residual solvent. In some other medicinal products, the same generic term "orange aroma" includes only two excipients — natural orange essence and maltodextrine. It has been found that SPCs of medicinal products approved for sale in the United Kingdom and United States report more detail as regards special warnings and precautions for use regarding the excipients (Ursino *et al.* 2011).

Additionally, in contrast to the manufacturing system of active ingredients, excipient quality disasters have happened recently that have heightened awareness for the need to better regulate the excipients industry. For example, in 2008, 84 children died in Nigeria after consuming teething formula containing glycerine contaminated with diethylene glycol (DEG) and in 2006, 46 people died in Panama after taking cough syrup also contaminated with DEG (Monsuur *et al.* 2010).

# 2.4.1. Paediatric and neonatal issues with pharmaceutical excipients

Excipients generally lack pharmacological action and are therefore historically considered to be the inert/inactive ingredients of drug formulation (Fabiano *et al.* 2011). Still, some excipients are clearly not consistently inert in their biological activity.

Excipients have the potential to harm patients in two ways. First, by introduction of a chemical hazard (e.g. toxicity, physiological effect) or physical (e.g. irritation). Secondly, adversely affecting the drug products availability or performance (e.g. changes in the bioavailability or modified release) (Carter 2011).

Most of the medicines are administered orally to children, often in a liquid formulation. To increase palatability and thereby compliance, colourings, sweeteners and flavourings are often added to the preparation (Nunn & Williams 2005).

Excipients are safe in the majority of adult patients, but can possess danger to children for example due to their different PK parameters compared to the adults (Tuleu 2007). As an example, benzyl alcohol is oxidised to benzoic acid, then conjugated with glycine in the liver, and excreted as hippuric acid in the urine. As the pathways involved in the metabolism of benzyl alcohol in premature babies are immature, the accumulation of benzyl alcohol can cause gasping syndrome (Hall *et al.* 2004) (Table 7). Risks to children (Fabiano *et al.* 2011, Ursino *et al.* 2011) and particularly to neonates (Whittaker *et al.* 2009) have been emphasised in several publications and also recognised by the drug regulatory authorities (Carter 2011).

**Table 7**. Examples of excipients with the safety concerns while used in children / neonates based on the literature data with the examples from infants and adults (The exhaustive list of excipients and safety problems could be found in publication III, Table 3)

	Excipient	Known safety concerns
Preservatives	Benzyl alcohol (BA)	Gasping syndrome – case report of 24GW neonate receiving i.v. clindamycin preserved with BA. After the third dose a profound desaturation and chest splinting occurred requiring resuscitation. (Hall <i>et al.</i> 2004)
	Parabens	Contact sensitization – 1,927 adult eczema patients were enrolled, patch test for parabens was positive for 1.1% (Dastychová <i>et al.</i> 2008)
Solvents	Diethylene glycol (DEG) Propylene glycol (PG)	Acute renal failure – outbreak due to DEG-contaminated cough syrup in Panama (Rentz et al. 2008)  Coma in a premature infant after receiving a wound dressing containing PG. An exceptionally high level of PG found in the urine. Cessation of the topical treatment resulted in complete recovery. (Peleg et al. 1998)
Stabilisers	Ethylenediamine	Anaphylactoid reaction – 31-year-old man with aminophylline (ethylenediamine salt of theophylline) allergy and positive intradermal test. (Asakawa <i>et al.</i> 2000)

One of the first reports of excipient toxicity was from 1938 when a liquid preparation of sulphanilamide contaminated with diethylene glycol killed over 70 people (Geiling & Cannon 1938). In the 1980s intravenous vitamin E preparation (E-Ferol) was associated with the development of an unusual symptom complex of pulmonary deterioration, thrombocytopenia, liver failure, ascites, renal failure and fatalities among low birth weight (<1,500 g), premature infants in neonatal intensive care units. An inhibitory effect by this vitamin E preparation was observed on the *in-vitro* response of human lymphocytes to phytohemagglutinin mixture. Polysorbate 80 used as a carrier in E-Ferol was found to be responsible for the suppression (Alade *et al.* 1986).

Benzyl alcohol as a preservative in intravascular flush solutions has been associated with a number of deaths and intraventricular haemorrhage in low-birth-weight infants (Hiller *et al.* 1986).

Haemolysis, central nervous system depression, hyperosmolality, and lactic acidosis have been reported after intravenous administration of propylene glycol, commonly used in parenteral medication (Arulanantham & Genel 1978).

There are few data available about the extent to which premature babies and neonates are exposed to excipients. Still, it has been shown that neonates are exposed to several potentially harmful excipients with the potentially toxic doses while receiving routine treatment.

As shown by Shehab *et al.*, neonates who received medications by continuous infusion, median cumulative benzyl alcohol (BA) and propylene glycol (PG) exposures were approximately 21 and 180 times the acceptable daily intakes of BA and PG, respectively. As the study was retrospective using electronic pharmacy record data, possible ADRs to excipients were not recorded (Shehab *et al.* 2009).

Allegaert *et al.* assessed prospectively the renal, metabolic and hepatic tolerance of PG in 69 (pre)term neonates after i.v. administration of medicines containing PG. They found that unintended PG administration (34 mg/kg/24 h) for a maximum of 48 h seems to be tolerated in (pre)term neonates and does not affect short-term postnatal adaptations (Allegaert *et al.* 2010).

Whittaker *et al.* calculated the quantity of excipients found in the most commonly used eight oral liquid medications by retrospectively analysing the drug charts of 38 infants less than 30 GW. The amount of excipient each preterm baby received was determined on a per kg per week basis. Infants were exposed to over 20 excipients including ethanol, PG and high concentrations of sorbitol. Many of the infants in the study were exposed to excipient levels that were greater than the maximum accepted daily intake in adults (Whittaker *et al.* 2009).

Langley *et al.* reviewed the excipients levels in paediatric intensive care units. They collected data from 5 randomly selected patients and contacted manufacturers to ascertain the quantities of excipients present. Patients were taking 49 medicines, for only 22% of these the details about excipients were received from manufacturers (Langley *et al.* 2011, not published).

Cordner et al. aimed to review the suitability of formulations given to the hospitalised children and neonates. Excipients within medicines administered over 4 weeks in January to February 2010 were identified from SPC or contacting the manufacturer and the suitability of each individual excipient was assessed following literature review. 80 different medicines were administered and 44 excipients were identified that were potentially unsuitable for use in children and neonates. Excipients were grouped into four classes: excipients that have a potential harmful effect (such as acetone, aspartame, benzoic acid, benzyl alcohol, chloroform, citric acid, ethanol, galactose, methylhydroxybenzoate, phenol, polysorbate 20 and 80, PG, sodium benzoate, sodium bicarbonate, sodium chloride and sodium dihydrogen phosphate); excipients with potential harmful effects only in extremely high concentrations (e.g. diethanolamine, disodium edetate, hydrochloric acid, sodium carbonate anhydrous, sodium hydroxide, sucrose, sulphuric acid and triethyl citrate); excipients with potential to affect the gastrointestinal tract in excess and cause flatulence or act as a laxative (e.g. carboxymethylcellulose sodium, croscarmellose sodium, hypromellose, magnesium stearate, maltitol liquid and mannitol) and excipients with potential to cause an ADR, such as hypersensitivity and anaphylaxis (e.g. cetyl alcohol, lactose, polyoxyethylene hydrogenated castor oil, potassium sorbate, propylhydroxybenzoate and butylhydroxybenzoate, protamine sulphate, saccharin sodium, sodium lauryl sulphate, sodium metabisulphate, sorbitol and tragacanth) (Cordner *et al.* 2012).

Studies of excipient exposure have until the present time only been based on the concentration in the medicinal product (Allegaert *et al.* 2010, Whittaker *et al.* 2009), but the concentration of most excipients in the blood of babies has never been measured.

The only earlier classification of excipients according to the potential safety / toxicity known to us has been developed by M. Turner (personal communication):

- 1. Excipient is known to cause harm in neonates in some circumstances;
- 2. No reports of excipient toxicity are available but the excipient is metabolised by pathways known to be immature in neonates;
- 3. Excipient is known to cause harm in older age groups but effects on neonates not clear;
- 4. There are other uncertainties:
- 5. Unlikely to cause harm in neonates because they do not cause harm in older age groups and metabolism is fully understood.

## 2.5. Summary of the literature

Throughout the last decade, safer and more evidence-based paediatric pharmacotherapy has become a target for clinical practitioners and regulatory bodies worldwide. Up to now, many of the medicines are not licensed for use in paediatrics (are used OL) or have no marketing authorisation (UL).

Additionally to the legislative initiatives aiming to increase the paediatric medicines licensing status, a substantial amount of paediatric drug utilisation studies and OL/UL medicines use studies have been performed and greater attention is paid to the quality of these studies.

The rates of OL/UL use have not been falling in recent years notwith-standing the combined effort of different specialities. Despite the methodological heterogeneity and various OL/UL definitions used, it has been shown that 6 to 100% of children in various age categories, different countries and treatment settings have received at least one OL/UL medicine. The extent of OL use, however, has been not previously studied in the Eastern-European countries or any of the developing or middle-income countries.

Also the rates of the UL medicines use have wide inter-country ranges – from no UL prescriptions to 48%. There is a lack of studies evaluating UL use of medicines (mainly defined as the use of medicines with no marketing authorisation) in small countries such as Estonia, where the availability of medicines is compromised compared to the countries with a larger populations.

If the medicine is not studied in clinical trials in children, official drug information such as SPC is generally lacking. Different information sources are then used in practice with the varying dosing guidance and evidence of information. It has not been previously shown how the selection of drug information

source affects the general rate of OL/UL prescribing and how does the availability of drug information differ between official drug information source e.g. SPC and expert-consensus based sources such as guidelines and reference books

Almost every medicinal product contains some pharmaceutical excipient. Compared with active ingredients the data on excipients (their content in medicines, tolerability and safety in vulnerable populations etc.) is even less well known. Furthermore, even if their safety has been evaluated the studies have been conducted in adults only or in experimental animals. Despite the limited physiological effects in adult population, toxicity resulting from the use of pharmaceutical excipients in children has been reported. The highest concern is the safety of excipients in neonates, as this is the most vulnerable population also presenting the biggest variations in maturation of drug metabolising processes. Limited published studies describing the neonatal excipient exposure have been focusing on the few well-described toxic excipients, which is only a modest fraction of the total excipient list. Still, toxicity or ADR reports have been published for many of the substances also used as pharmaceutical excipients. The extent of excipient use, especially of those with known toxicity in paediatric population is largely unknown. No validated classification system exists until the present time for categorising the pharmaceutical excipients according to their potential safety / harmfulness to young children.

#### 3. AIMS OF THE RESEARCH

Our general aim was to describe the current situation of paediatric pharmacotherapy in terms of the prescription pattern and use of OL/UL medicines in the ambulatory and hospital setting and the extent of pharmaceutical excipient exposure in hospitalised neonates.

The specific aims were as follows:

- 1. To describe the Estonian paediatric drug utilisation pattern in the outpatient setting and in the neonatal wards;
- 2. To compare the paediatric ambulatory antibiotic prescription pattern between Estonia and Sweden;
- 3. To investigate the labelling status of prescribed medicines according to the Estonian SPC;
- 4. To identify the critical areas in paediatric / neonatal pharmacotherapy where drugs are used most commonly and where the information in SPC is most often lacking;
- 5. To compare the availability of paediatric / neonatal information in Estonian SPCs with other widely used drug information sources such as BNFC and Thomson Micromedex database;
- 6. To develop a classification of excipients depending on their potential toxicity present in medicines used in neonatal wards in Estonia;
- 7. To describe the presence of toxic and potentially toxic excipients in neonatal medicines;
- 8. To describe the extent of inpatient neonatal exposure to excipients in general and potentially harmful excipients.

#### 4. PATIENTS AND METHODS

The thesis consists of three studies and additional analysis of the data collected on the neonatal use of medicines as presented in Table 8.

**Table 8.** Description of studies and analyses of the thesis

Study characteristic	Timing	Population / prescriptions	Primary aim	Publication
Cross-sectional drug utilisation study	1.01.2007 – 31.12.2007	467 334 prescriptions dispensed to 151 476 subjects up to 18.99 y from the EHIF database	To describe the accordance of the ambulatory paediatric prescriptions to the Estonian SPCs	I
Prospective cohort study in neonatal wards	1.02. – 1.08.2008 in TUC and 1.02. –1.08.2009 in TCH	348 neonates PNA <29d	To investigate the labelling status of prescribed drugs according to the Estonian SPC	П
Excipients use study	Post-hoc analysis of neonatal study data	348 neonates PNA <29d	To estimate the extent of excipient exposure in hospitalised neonates	III
Comparative antibiotic use study	1.01.2007 – 31.12.2007	159 304 prescriptions from EHIF and 681 954 from SPDR database for children up to 17.99y	To compare the paediatric outpatient antibiotic use in Estonia and Sweden	IV

EHIF, Estonian Health Insurance Fund; PNA, postnatal age; SPC, summary of product characteristic; SPDR, Swedish Prescribed Drug Register TUC, Tartu University Clinics; TCH, Tallinn Children's Hospital; y, year; d, days

#### 4.1. Ethics

Prescription database studies did not need the ethics committee approval as no personal identifiers were collected.

Prospective cohort study was approved by the Ethics Review Committee of the University of Tartu (No 167/T–9, received 28.01.2008). The study used anonymised data collected in routine clinical practice and did not require individual consent of the parent.

## 4.2. Design of the studies and data collection

**Drug utilisation studies on dispensed ambulatory prescriptions** were based on the Estonian Health Insurance Fund (EHIF) prescription database and Swedish Prescribed Drug Register (SPDR) databases. The period of prescriptions dispensed that was extracted from both databases was from 1.01.2007 to 31.12.2007. Estonian data for the comparative antibiotic use study was a subset of cross-sectional drug utilisation study data.

Both databases are nationwide prescription databases, containing electronically submitted data of all prescription medicines dispensed by the pharmacies to individuals receiving ambulatory care. The Estonian database contains individual patient and physician identification numbers and is diagnosis-linked. The Swedish database contains product identification and patient's age but no information with regard to dose or indication.

**Table 9.** Data used for cross-sectional drug utilisation and comparative antibiotic use study

Study	Data- base	Age group studied	Data extracted
Cross-sectional drug utilisation study	EHIF	Up to18.99 y	EHIF: Age and identification code of patient, drug data (package code, WHO ATC code, brand name and INN, formulation, content per dose unit), number of packages dispensed, subsequent diagnoses
Comparative antibiotic use study	EHIF SPDR	Up to 17.99y	EHIF: same as in cross-sectional study and additionally prescriber speciality SPDR: aggregated data on the number of prescriptions for each active substance for each age group

ATC, Anatomical Therapeutic Chemical code; INN, International Non-proprietary name; WHO, World Health Organization

Population data were obtained from the Statistics Estonia (http://pub.stat.ee/px-web.2001/Database/Rahvastik) and from Statistics Sweden (http://www.scb.se).

**Neonatal drug utilisation study** was a prospective cohort study conducted in the neonatal intensive care units (NICU) and intermediate-level neonatal wards of Tartu University Hospital's (TUC) Children Clinics and Tallinn Children's Hospital (TCH). All medicines prescribed to neonates with postnatal age <29 days who were treated at TUC between 1 February and 1 August 2008 and at TCH between 1 February and 1 August 2009 were recorded twice weekly from the medicines charts by the 3 investigators, including author of the thesis.

The following information was collected from the hospital records twice a week: demographic data [gestational age (GA), birth weight, gender, date of

birth], all diagnoses, admission and discharge dates and all prescriptions (international non-proprietary or product names (INN), doses and duration of treatment and formulations). If only INN name was collected from the patient record, the product names were specified from the pharmacy database. We did not record the use of standard intravenous replacement solutions, blood products, oxygen, nutritional and technical products (including contrast agents), basic creams and ointments, parenteral nutrition solutions, vaccines and vitamins (including colecalciferol).

**Excipients use study** was a *post-hoc* analysis based on the data collected during the prospective cohort study in neonatal wards described above. All of the pharmaceutical excipients in medicines used during the study period were primarily determined from the SPCs. If the drug product was not registered in Estonia in September 2009 and thus the SPC was lacking, the package inserts were used. The names of the excipients and synonyms were double-checked from the Rowe's Handbook of Pharmaceutical Excipients (Rowe et al. 2009) and classified into the safety categories based on the literature review. The following literature sources were used for classification: Rowe's Handbook of Pharmaceutical excipients 6<sup>th</sup> ed., European Commission guidelines on the excipients in the label and package leaflet of medicinal products for human use (European Commission 2003), EMA reflection paper formulations of choice for the paediatric population, 2006 (EMA) CHMP 2006), article by Fabiano et al. (Fabiano et al. 2011) and book from Costello et al. (Costello et al. 2007). A PubMed database search was conducted by using the name of each identified excipient AND/OR synonyms AND "human toxicity" as search terms; no other limiters or terms were used to narrow or widen the search. If there were no results in the PubMed search or other abovementioned information sources, Google scholar (http://scholar.google.com; last accessed 24th September 2011) search was conducted using the same search terms. In this study, all excipients for which according to the abovementioned sources there were some safety concerns, including the data from experimental studies, and there was no neonatal data demonstrating that these are safe were classified as "potentially harmful" (Table 11).

## 4.3. Age categories of study population

The age categories recommended by the ICH were used in studies for dividing children into the subgroups. These age ranges reflect biological changes – the changes after birth (preterm neonates born before 37 gestation weeks and term neonates); the early growth spurt (infants and toddlers from 28 days to 23 months); gradual growth from 2–11 years; the pubertal and adolescent growth spurt and development towards adult maturity (12–18 years) (Stötterb 2007).

In the prescription database studies the age group 2–11 years was further subdivided in terms of the child's ability to accept and use different dosage forms into pre-school children (2–5 years) and school children (6–11 years).

The group of preterm neonates was further subdivided into extremely preterm (gestational age (GA) <28 weeks), very preterm (28–31 weeks) and late preterm (32–36 weeks).

## 4.4. Assessment of licensing status of the medicines

The following four SPC sections of the medicinal products were reviewed for paediatric information as of February 2009 (ambulatory prescriptions) and as of September 2009 for neonatal information (prescribed to hospitalised neonates): indication (4.1), administration (4.2), contraindications (4.3) and warnings (4.4).

Products with the same active substance but different brand name, dosage and formulation were evaluated separately as they have separate SPCs.

Drugs were then categorised to labelled, OL in terms of age and UL as presented in the Table 10.

A drug was considered OL if it was prescribed to a child below the lowest approved age or outside of the age brackets mentioned in the SPC. We did not classify drugs to OL based on the indications, formulations and routes of administration. OL use was further divided into two groups – OL because of lack of paediatric information and OL because of contraindication (CRI).

**Table 10.** Categories of drugs according to the information in SPC

Cate	gory	Information in SPC
L	L for all children	Information about paediatric / neonatal use available in point
		4.1 or / and 4.2*; not CRI for children
	L for specific age	Information about paediatric / neonatal use available in 4.1 or
	group	/ and 4.2*; Indicated for children over certain age, for
		children able to swallow oral solid dosage forms, for children
		over certain weight
	L for specific age	Indicated for children over certain age and with specific
	group and diagnosis	diagnosis
OL	No data	Children / neonates not mentioned in SPC or the following
		sentence used: "no data for use in children", "for using in
		children exists limited information / experience", "not
		recommended for children because of the limited information
		/ experience", "not recommended for children because of the
		drug formulation is not appropriate"
	CRI	CRI for children / neonates
	CRI for use in specific	CRI under certain age, CRI for children under certain weight
	age group	
UL		Product has no MA in Estonia, chemicals that were prepared
		into a formulation within the hospital pharmacy

<sup>\*</sup>SPC topics: indication (point 4.1), administration (point 4.2).

CRI, contraindicated; L, labelled; OL, off-label; UL, unlicensed; MA, marketing authorisation

There were four products (less than 0.3% of all prescriptions) prescribed to outpatient children for which, for the consistency, the weight-based recommendations were transformed to the age-based. Enalapril, azitromycin and doxycyclin tablets were recommended for children over 15, 20, 45 and 50 kg, respectively. The weights were transformed to the matching age as follows: if the product was licensed for use over 15 kg, it got classified as to be licensed for children older than 5 years and over 20 kg, for those older than 12 years. If the product was labelled for children who are able to ingest solid dosage formulations or for school-aged children, it was considered to be licensed for children over 6 years old.

Amongst the ambulatory prescriptions 20 most often prescribed OL medicines were chosen to compare the differences in the availability of paediatric information in SPC, British National Formulary for children (BNFC) (BMJ Group. 2009); Micromedex database (Thomson Reuters Micromedex 2.0), and Harriet Lane Handbook 18<sup>th</sup> ed. (Custer J.W & Rau R.E. 2009).

# 4.5. Classification of excipients according to their potential toxicity to neonates

The classification system of excipients was developed for the study purpose and excipients were divided into four categories as detailed in Table 11 based on the literature sources described in section 4.2.

**Table 11**. Classification of excipients to which studied neonates were exposed according to the literature review

Category	Safety status	Description
1	Potentially safe	No ADRs reported
2	Potentially harmful and known to be harmful	ADRs reported
3	No safety data found	No data found in the literature on human exposure and toxicity
4	Description of the excipient in SPC or PIL unspecific	Description does not allow a specific literature search

ADR, adverse drug reaction; PIL, product information leaflet

## 4.6. Analysis of the data

The prescriptions were categorised based on the World Health Organisation's Anatomical Therapeutic Chemical (ATC) classification system (http://www.whocc.no/atc ddd index/).

Descriptive statistics was used in all of the studies for prescription data and demographics. For ambulatory prescriptions the prescription rate in general and

in each age group, in ATC group and specific product level (number of prescriptions per 1000 children aged up to 18.99 years or per number of children in the age group) and crude 1 year prevalence of drug use in children (proportion of patients of the paediatric population who had one or more prescriptions issued) were calculated.

The paediatric antibiotic use was expressed as number of prescriptions for systemic antibiotics (ATC code J01) per 1000 children aged up to 17.99 years in the population/year and calculated the 95% confidence intervals (CIs) by using R64 software (http://www.r-project.org/).

For neonatal medicines use study in the interest of completeness the data of both hospitals and wards was pooled as both hospitals are in general similar and follow the same treatment guidelines. The prescription rates (the number of prescriptions per 100 admissions) for each hospital (and CIs), drug group and each individual drug were calculated. If two or more courses of the same agent were given within the same hospitalisation it was reported only once. StatsDirect software (ver. 2.7.8) and Welch's two sample two-tailed t test were used to compare continuous variables and the chi-squared test was used to compare categorical values. Cochran-Armitage trend test was used to evaluate the trends of prescription rates in different GA groups.

#### 5. RESULTS AND DISCUSSION

## 5.1. Demographics of the study populations

#### 5.1.1. Ambulatory patients in Estonia and Sweden

Altogether 151 476 subjects aged up to 18.99 years were identified from the Estonian Health Insurance Fund (EHIF) prescription database in 2007 as seen in Table 12.

**Table 12.** Number of Estonian children who had been receiving a prescription medicine during year 2007 divided into the age groups and total number of children in age groups in Estonia.

Age group	Treated children in Estonia	Total number of children
(years)	(unique subjects)	Estonia
< 2	22 949	29 091
2–5	37 689	52 233
6–11	33 034	74 202
12-18.99	57 798	102 989
Children total	151 476	277 265 *

<sup>\*</sup> The total number was 258,515 when children aged up to 17.99 years counted for the antibiotics use study

The paediatric population of children aged up to 17.99 years in 2007 was 7.5 times smaller in Estonia (n = 258,515) as compared to Sweden (n = 1,933,920). As the Swedish database contains only aggregated data on the number of prescriptions for each active substance for each age group, the number of unique children with the prescription was not available to us.

#### 5.1.2. Hospitalised neonates

A total of 490 neonates were admitted to the study centres during the study periods as seen in Figure 1.

About 40% of admitted neonates were preterm, of whom 8% were extremely premature babies. The ratio of preterm neonates in TUC was higher than that in TCH [46%, 95% CI 40%; 53% vs. 37%, 95%CI 31; 42; p = 0.028], but the proportion of extremely preterm neonates was greater in TCH compared with TUC (10%, 95% CI 7; 15 vs. 5%, 95% CI 3; 9; p = 0.047).

The proportions of neonates receiving pharmacotherapy were slightly different in the two study centres: 156/203 in TUC (77%, 95% CI 71; 82) and 192/287 in TCH (67%, 95% CI 61; 72), but the difference was not statistically different (Chi-square test value 0.017).

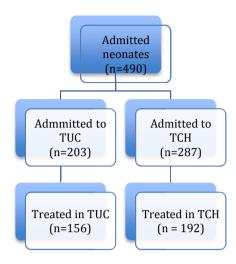


Figure 1. Flow-chart of the neonates hospitalised and treated in TUC and TCH

The prescription rates were in general similar between the hospitals -405 (95% CI 377; 434) per 100 admissions in TUC and 397 (95% CI 374; 421) in TCH (p = 0.65). Despite the small variations the data from both hospitals was decided to pool.

Neonatal hyperbilirubinaemia (n = 192), perinatal infections (n = 103) including neonatal sepsis (n = 50) and respiratory distress syndrome (n = 83) were the most common reasons for hospitalisation. The same diagnoses prevailed also in other neonatal studies making our data representative to neonatal population in general and not specifically for Estonia (Altman *et al.* 2011, Jakuskiene *et al.* 2011, O'Donnell *et al.* 2002).

**Table 13.** Demographics of the neonatal study population

	Extremely preterm neonates	Very preterm neonates	Late preterm neonates	Term neonates	Total
No of children admitted (male)	41 (22)	53 (27)	105 (49)	291 (170)	490 (268)
Median No of hospitalisation days (IQR)	28 (12–80)	31 (24–41)	15 (10–21)	8 (5–11)	10 (5–19)
Average birth weight* (g) + SD	739 (209)	1370 (412)	2084 (448)	3455 (618)	2446 (1124)
Survival (%)	71	94	98	99	96

<sup>\*</sup> Birth weight was not available for 3 children IQR, inter quartile range; SD, standard deviation

### 5.2. Drug utilisation pattern

#### 5.2.1. Ambulatory drug utilisation

A total of 467 334 prescriptions to 851 products with 309 unique active substances or combinations were dispensed, making the crude 1 year prevalence of 54.6% and prescription rate 1.7 per child. Those aged below 6 years received twice as many prescriptions (2.5 prescriptions per child) as children over 6 years old (1.2 and 1.4 prescriptions per child for 6–11 years old and for 12–18 years old children, respectively). There was a statistically significant difference of the prescription rates between all age groups.

We observed similar prescription rates as shown by others (Clavenna & Bonati. 2009, Olsson *et al.* 2011). Also our finding that preschoolers receive more prescriptions than older children is consistent with previous studies from other countries (Clavenna *et al.* 2009, Madsen *et al.* 2001, Schirm *et al.* 2000, Thrane & Sørensen 1999). Why more medicines is given to preschool children has not been systematically studied but one could speculate that it probably reflects the difference in illness prevalence between age groups due to immature immune systems, lack of appropriate hygiene and crowding in the day care settings, the youngest children have more illness episodes, especially infections, than older children (Straand *et al.* 1998, Thrane & Sørensen 1999).

#### 5.2.1.1. Ambulatory prescription pattern according to the ATC groups

Anti-infectives were the most commonly prescribed ambulatory medicines in all age groups, followed by respiratory and dermatological medicines contributing together 77% of the total prescriptions (Figure 2). Our finding that antibiotics are the most commonly prescribed medicines in children has been described almost in all studies (Olsson 2011; Clavenna 2009).

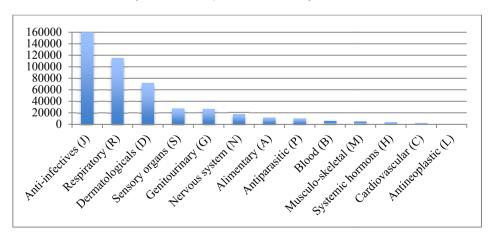


Figure 2. Number of ambulatory prescriptions (y axis) according to the ATC groups (x axis)

The 20 most commonly prescribed chemical agents comprised 57% of all prescriptions, which was less than in Norway – 75.3% (Straand *et al.* 1998).

The **respiratory medicines** is a heterogeneous ATC group, which can be divided into drugs for cough or asthma and drugs for allergy. As seen from the Table 14, antihistamines for systemic use were by far most commonly used respiratory medicines.

Cetirizine drops and desloratadine syrup prevailed for <12 year old children and cetirizine + pseudoephedrine tablets and desloratadine tablets lead the list for adolescents.

Second common group selective beta-2 adrenoreceptor agonists for systemic use consisted mainly of salbutamol, which was prescribed extensively for children of all ages.

Leukotriene receptor antagonist montelukast tablets were used often in the age group 2–5 years.

Of the local antibiotics fusafungin spray was prescribed, most often to 2 to 5 year old children.

**Table 14.** Ambulatory prescription rate of respiratory medicines for Estonian children (No of prescriptions per 1000 users)

	A	ge grou	ıps (year	s)	
ATC subgroup (ATC code)	<2	2–5	6–11	12-18	Total
Antihistamines for systemic use (R06A)	291	218	78	70	657
Selective beta-2 adrenoreceptor agonists					
for systemic use (R03AC)	156	179	52	13	400
Leukotriene receptor antagonists (R03DC)	54	126	42	5	227
Glucocorticoids for inhalation (R03BA)	29	61	41	11	142
Nasal corticosteroids (R01AD)	4	39	54	50	147
Mucolytics (R05CB)	30	70	18	7	125
Throat preparations, local AB (fusafungin,					
R02AB03)	11	49	33	29	122
Others	31	56	48	48	183
Total	607	797	367	232	2003

AB, antibiotics

Respiratory medicines were on of the most commonly used drug group similarly to us also in Sweden, Spain and Germany (Morales-Carpi *et al.* 2010, Mühlbauer *et al.* 2009, Olsson *et al.* 2011) and salbutamol (Bianchi *et al.* 2010, Sturkenboom *et al.* 2008) and cetirizine (Schirm *et al.* 2000) were amongst most commonly used respiratory medicines.

**Dermatological products** were by far more often used in children younger than 2 years compared to older children as seen in Table 15. Most commonly used drug groups for pre-school children were topical corticosteroids and for

adolescents anti-acne products. Generally, topical products containing fusidic acid and hydrocortisone + chlorhexidine (80 and 78 prescriptions / 1000, respectively) were most often prescribed.

Dermatological medicines were in the third place also in Sweden (Olsson *et al.* 2011) and similarly to Estonia, topical corticosteroids were most frequently used among the <2-year-old Danish children (Thrane & Sørensen 1999). Fusidic acid (1518 and 6273 users / 1000) and hydrocortisone (1287 and 12310) were also the most common individual dermatological drugs used in The Netherlands and UK, nevertheless the prescription prevalence was considerably higher there than in Estonia.

Not surprisingly, anti-acne preparations comprised an increasing proportion among the oldest children also in Denmark (Thrane & Sørensen 1999).

**Table 15.** Ambulatory prescription rate for dermatological medicines for Estonian children (No of prescriptions per 1000 users)

		Age gr	oup (yea	ars)	
ATC subgroup	<2	2-5	6-11	12-18	Total
Topical corticosteroids, combinations (D07B)	252	99	42	34	427
Topical corticosteroids, plain topical (D07A)	127	65	37	41	270
Topical anti-acne products (D10)	2	1	5	169	177
Pimecrolimus (D11AH02)	51	30	5	4	90
Local antifungal products (D01A)	34	13	12	14	73
Local antibacterial products (D06A)	39	35	16	12	102
Local anti-psoriatic products (D05A)	0.1	1	5	11	17.1
Other	3	3	2	5	13
Total	507	247	124	288	1166

## 5.2.2. Prescription pattern of antibiotics in Estonia compared to Sweden

#### 5.2.2.1. Quantitative differences

The total paediatric antibiotic use was almost twice as high -616 per 1000 (95%CI 613; 619) in Estonia versus 353 per 1000 (95%CI 352; 354) in Sweden (Figure 3).

As antibiotic prescribing depends antimicrobial susceptibility as well as on local prescription habits the quantitative and qualitative regional variations in the antibiotics prescription profile are understandable (Clavenna & Bonati 2011, Rossignoli *et al.* 2007). As of many examples, in Italy the antibiotic prescription rate was twice as high compared with Denmark (67 Defined Daily Doses per 1000 inhabitants per day (DDD/TID) vs. 35 DDD/TID, respectively) (Lusini *et al.* 2009) and the children in British Columbia received substantially more

antibiotic prescriptions than Danish counterparts (608 versus 385 prescriptions per 1000 children, respectively) (Marra *et al.* 2007).

However, the quantitative differences seen in our study could not be simply explained by dissimilarities in resistance levels of common outpatient microorganisms, which have been reported to be low in general in both countries. For example, in 2005 to 2009, the proportion of methicillin resistant *S. aureus* has ranged between 2% to 9% in Estonia and 0.5% to 1% in Sweden (EARS-NET).

Similarly to the general prescription pattern in Estonia, the preschool children were also most exposed age group to antibiotics. The probable reasons for this phenomenon are discussed in the previous section 5.2.1. The highest prescription rate of antibiotics in Estonia was found among 2 to 6 year old children whereas in Sweden it was highest among those less than 2 years old (Figure 3). Adolescents had the lowest rate of antibacterial prescriptions in both countries but the difference in favour of Sweden as in all other age groups was observed.

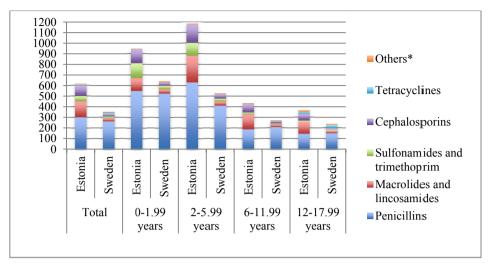
In concordance with our results, the pre-school children have shown to be the most exposed age group to antibiotics also by others (prevalence 72%; prescription rate 2.2) compared to the older children (prevalence from 14 to 57% (mean 34%), prescription rate from 0.2 to 1.3) (Rossignoli *et al.* 2007). Previously, a striking difference in antibiotic prescribing between Italy and Denmark has been highlighted for children aged from 0 to 9 years (Vaccheri *et al.* 2002).

## 5.2.2.2. Differences in the selection of antibiotics between Estonia and Sweden

A total of 55 different active substances (22 in Estonia and 50 in Sweden) were used. However, 90% of prescriptions in both countries were covered by 8 agents, as seen in Table 1, paper IV.

Penicillins were the most widely prescribed antibiotics with the similar prescription rate in both countries (Figure 3) but the ratio of penicillins of all prescriptions was significantly greater in Sweden than in Estonia (74% vs. 49%).

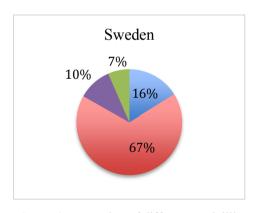
In addition, the qualitative selection of penicillins differed considerably – extended spectrum penicillin amoxicillin or its combination with beta-lactamase inhibitor (amoxicillin + clavulanic acid) were commonly prescribed in Estonia whereas narrow spectrum penicillins (e.g. phenoxymethylpenicillin) covered half of the prescriptions in Sweden (Figure 4).



**Figure 3.** Number of prescriptions per 1000 children (y axis) of systemic antibacterials (ATC group J01) by age groups in Estonia and Sweden (x axis)

\* Includes monobactams (J01DF), carbapenems (J01DH), aminoglycosides (J01G),

\* Includes monobactams (J01DF), carbapenems (J01DH), aminoglycosides (J01G), quinolones (J01M) and other antibacterials (J01X)



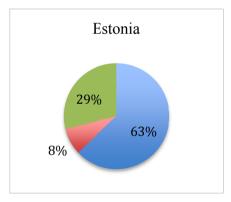


Figure 4. Proportion of different penicillins used in Estonia and Sweden

Blue: Penicillins with extended spectrum (J01CA; ampicillin, amoxicillin, pivme-

cillinam, piperacillin)

Red: Beta-lactamase sensitive penicillins (J01CE; benzylpenicillin, phenoxy-

metylpenicillin)

Green: Combinations of penicillins, incl. Beta-lactamase inhibitors (J01CR;

amoxicillin + clavulanic acid, sultamicillin, piperacin + tazobactam)

Purple: Beta-lactamase resistant penicillins (J01CF; dicloxacillin, flucloxacillin)

Similarly to our results for Estonia, extended-spectrum penicillin amoxicillin has also been reported to be the most frequently prescribed antibiotic in the Netherlands and Canada and amoxicillin with clavulanic acid combination in Italy (Clavenna & Bonati 2011).

The reasons why Estonian physicians tend to prescribe more often wide spectrum agents compared to Swedish colleagues have not been systematically studied but the likely reasons could involve the relatively liberal guideline recommendations. For example, for acute tonsillitis, the Estonian guidelines (http://www.haigekassa.ee/raviasutusele/ravijuhendid/andmebaas/tunnustatud), in addition to phenoxymethylpenicillin recommend amoxicillin despite the fact that *S. pyogenes* is uniformly susceptible to penicillin (Hraoui *et al.* 2011). Other reasons could involve the pressure from parents to receive the newest agents, a limited option for etiologic diagnosis in outpatient setting, the promotional activities of pharmaceutical industry, the lack of detailed knowledge due to poor dissemination of guidelines or simply poor adherence to guidelines (Hedin *et al.* 2006). The latter reason could apparently be supported by the significant amount of antibiotic prescriptions for acute bronchitis, a disease not requiring antibiotic treatment at all.

Macrolides accounting for 24% of prescriptions were extensively used in Estonia (149 prescriptions per 1000) in all age groups, with the highest rates observed among children aged 6 to 17 years whereas in Sweden they were used less frequently (29 prescriptions per 1000; 8% of all prescriptions) (Figure 3). The extended use of macrolides has been related to increased carriage of penicillin non-susceptible *S.pneumoniae* (Lusini *et al.* 2009) and considered as a major driver for the increase in beta-lactam resistance (EARS-Net 2010). The inappropriate prescription of that group of antibiotics was one of the initial targets for STRAMA programme in Sweden (Mölstad *et al.* 2009) and macrolide treatment of upper respiratory infections is only recommended if the patient is allergic to penicillins (Högberg *et al.* 2005).

Also the types of macrolides also differed between countries – clarithromycin predominated in Estonia while the parent drug erythromycin was mainly used in Sweden (Table 1, paper IV). The preference of clarithromycin by Estonian prescribers could possibly be explained by the easier administration scheme – twice as compared to four times daily. Slightly better tolerability in terms of gastrointestinal side effects of clarithromycin compared to erythromycin has also been reported (Lee *et al.* 2008).

#### 5.2.3. Prescriptions for hospitalised neonates

A total of 1981 prescriptions for 115 products and 105 active substances were administered to 348 neonates. The prescription rate was 5.7 (Table 16), which is higher than the ambulatory prescription rate in Estonia (1.7 / 1000), but similar to studies from other countries (range from 3 to 7) (Conroy *et al.* 1999, DellAera *et al.* 2007, O'Donnell *et al.* 2002, Oguz *et al.* 2012). However, the extent of neonatal drug exposure has found to be varying between studies

depending on one hand on the used methodology and on the other hand on the treatment habits and guidelines.

The median number of products per child (n = 4; range 1 to 26) in our study was broadly similar to that in Italy (n = 5.5; range 1 to 15) (DellAera *et al.* 2007) and Finland (n = 4.2; range 0 to 19) (Lindell-Osuagwu *et al.* 2009) but was more than half lower that in a recent study from Germany – 8. The latter study did not exclude the vitamins and included also the medications given prior to the admission to the neonatology ward (e.g. drugs given in the delivery room), which could partly explain differences from our study (Neubert *et al.* 2010).

The prescription rate in preterm neonates was greater than in term neonates as seen in Table 16. All of the extremely preterm neonates received pharmacotherapy compared to the 59% of full-term babies. Preterm neonates received 68% of all prescriptions. There was a negative correlation between prescription rate and GA, which has been also reported elsewhere (Kumar *et al.* 2008, Neubert *et al.* 2010, Warrier *et al.* 2006).

Table 16. General prescription pattern in hospitalised neonates

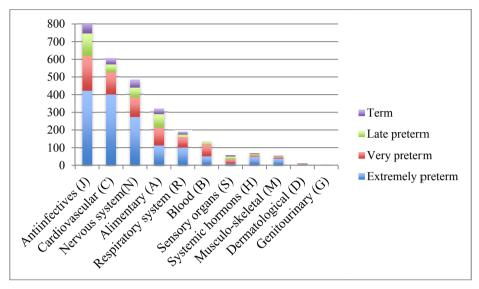
	Extremely	Very	Late	Term	Total
	preterm	preterm	preterm	neonates	
	neonates	neonates	neonates		
No of children	41 (22)	53 (27)	105 (49)	291 (170)	490
admitted (male)					(268)
No of children who received drugs (%)	41 (100)	48 (91)	87 (83)	172 (59)	348 (71)
No of prescriptions	596	367	376	642	1981
Prescription rate*	14.5	7.6	4.3	3.7	5.7
No of products used	66	66	65	85	115
No of active	62	62	61	81	105
substances used					

<sup>\*</sup> Number of prescriptions per treated neonate in GA group

## 5.2.3.1. Prescription pattern according to the ATC groups for hospitalised neonates

The drug utilisation pattern in very preterm infants (<31 weeks GA) was different compared with newborns with a higher GA. Similarly to outpatient medicine use antiinfectives for systemic use were the most commonly prescribed in all GA categories. These were followed by cardiovascular agents in extremely and very preterm neonates, alimentary medicines in late preterm neonates and nervous system drugs in term neonates (Figure 5). The same ATC groups have been most often prescribed in other neonatal studies (Clark *et al.* 2006, Warrier *et al.* 2006).

In line with prescription rates, the number of different products used during our study period was the highest for cardiovascular (n = 24), systemic anti-infectives and nervous system drugs (n = 20 for both).



**Figure 5.** Prescription rates per 100 neonatal admissions (y axis) by GA and ATC groups (x axis)

Of the antiinfectives gentamicin (prescription rates per 100 admissions from 31 to 82 depending on GA) and ampicillin (prescription rates from 4 to 32) were used most commonly in all of the GA groups (Paper II, Table 3). Gentamicin, as an antibiotic recommended for empiric treatment of early onset sepsis (EOS) and late onset sepsis (LOS) by most guidelines has been reported to be the most frequently used antibiotics in hospitalised neonates in the UK (Conroy *et al.* 1999), US (Clark *et al.* 2006) and Australia (O'Donnell *et al.* 2002). In other countries other aminoglycosides prevail – amikacin in Italy (DellAera *et al.* 2007) and tobramycin in Germany (Neubert *et al.* 2010).

The heterogeneity of antibiotics selection indicates that empiric antibiotic treatment varies among neonatal intensive care units and countries and there are currently no consensus guidelines regarding the choice of empiric antibiotics (Venkatesh & Garcia-Prats 2008). Still, it has been shown that ampicillin or penicillin G combined with gentamicin are equally effective and safe agents in the early initial empiric treatment of neonates with risk factors of early onset sepsis (Metsvaht 2009).

Of the cardiovascular medicines, most often catecholamine dobutamine was prescribed to the extremely and very preterm neonates (24 prescriptions per 100 admissions in both GA groups) (Paper II, Table 3). Similarly to our study, the most frequently used diuretic was furosemide also in the neonatal unit in Germany (Neubert *et al.* 2010).

Of the central nervous system drugs, fentanyl (from 8 to 30 prescriptions per 100 admissions depending on the GA) and midazolam (from 5 to 32 prescriptions per 100 admissions) showed a high number of prescriptions. Paracetamol parenteral solution and rectal suppositories (9 and 22 prescriptions per 100 admissions, respectively) were used often in term neonates, but compared to our study, it was prescribed rarely in Germany (Neubert *et al.* 2010).

Neonates received medicines mainly via parenteral route (61/107). The other routes like oral administration of manipulated crushed tablets or opened capsules (19/107), oral liquids (8/107), topical ointments and creams (6/107), ophthalmic (5/107), rectal (4/107) and inhalation (4/107) medicines were rarely used. The general problems with manipulated dosage forms are lack of information on the bioavailability and stability of the manipulated drug (Nahata & Allen Jr 2008). Some studies have shown the equal bioavailability of crushed tablets with non-manipulated product, for example for the voriconazole (Ashley et al. 2007). At the same time administration of crushed tablet of oral angiogenesis inhibitor pazopanib increased area under the curve (AUC (0–72)) by 46% compared with the whole tablet administration, Cmax was increased by twofold and Tmax decreased by 2h (Heath et al. 2011).

Differences in the rates of medicines use according to the ATC classes between study centres were observed. These were mainly caused by few active substances. Cardiovascular drugs, consisting mainly of dopamine and epinephrine were prescribed more often in TCH (89/100, 95% CI 78–100 vs. 62/100, 95% CI 52–74 in TUC), and antibacterials were prescribed more often in TUC (150/100, 95% CI 133–168 vs. 107/ 100, 95% CI 94–118 in TCH). Intra-country difference in prescription prevalence has been also described previously (Bianchi *et al.* 2010; Rossignoli *et al.* 2007). Although the reasons of such in-country differences were not studied one could speculate that lack of evidence-based guidelines in treating several neonatal conditions could be one of them.

#### 5.3. OL use of medicines

#### 5.3.1. Ambulatory OL use

Altogether 31% of ambulatory prescriptions were OL in terms of age. The majority of those (29%) did not have any information of paediatric use in the SPC and 2% were contraindicated (CRI) for the respective age. It is hard to put our findings into the context with others due to the great variability in previous studies – ranging from 3.2% of OL use in Germany (Mühlbauer *et al.* 2009) up to 51% in Spain (Morales-Carpi *et al.* 2010). However, when looking at the median rate of OL use (20%) our results are still higher (Table 4).

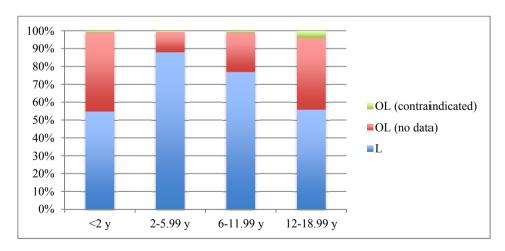
The great variability of OL medicines use rates found in different studies is at least partly attributable to the various definition, number and quality of reference sources used for classifying medicines into the OL category but also to the study patients and medicines selection. The lower end of OL use has been

generally described in the studies using more than one reference source for classification.

The wide variation of the OL medicines use rates is most probably explained by the classification differences. Relatively low OL rate (13.6) was described in the Netherlands (Jong *et al.* 2002) as all of the medicines with no paediatric information in SPC were classified quite the contrary to most other studies UL instead of OL. At the same time, in the study with the highest OL rate (51%) performed in Spain, the broadest definition of OL was used including the age, indication, dosage, frequency, route of administration, and also lack of paediatric information (Morales-Carpi *et al.* 2010).

In addition, significant differences in the content of the SPCs between countries have been observed, which explain partly the differences in OL prescription rates in various studies (Sturkenboom *et al.* 2008). Surkenboom *et al.*, when comparing the SPCs with that of the UK, Holland and Italy, reported that only 25% of the agents had the same age limit from which the drug was approved (Sturkenboom *et al.* 2009). These differences are likely to be minimised after implementation of mutual recognition in drug approval process.

Although we found that almost half of the prescriptions for infants and adolescents are OL, the proportions in preschool and schoolchildren are only approximately 10 and 20%, respectively (Figure 6). Previous data in this respect vary. The vast majority similar to us have also reported that infants, neonates and adolescent receive more often OL medicines than children of other age groups (Bucheler *et al.* 2002, Chalumeau *et al.* 2000, Di Paolo *et al.* 2006, Kimland *et al.* 2012, Palčevski *et al.* 2012, Schirm *et al.* 2003). However, there are other studies in which OL prescription rates were not dependent on age (Ekins-Daukes *et al.* 2004, Horen *et al.* 2002).

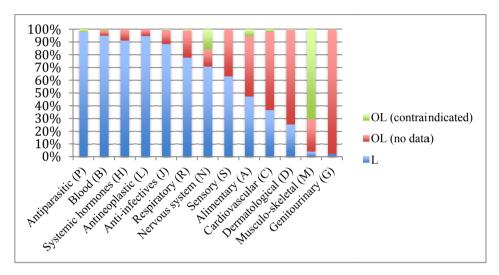


**Figure 6.** The proportion of ambulatory prescriptions classified as labelled (L) or off-label (OL) (y axis) in age groups (x axis)

#### 5.3.1.1. Ambulatory OL ATC groups and products

The OL rate was the highest in genitourinary drugs group (97%), followed by dermatological (74%) and cardiovascular drugs (61%) (Figure 7). The most commonly prescribed ATC group anti-infectives were generally labelled for use in children (88% of prescriptions were labelled).

Drug groups with the highest percentages of ambulatory OL use have found in previous studies to be varying but similar to us (Morales-Carpi *et al.* 2010, Olsson *et al.* 2011, Radley *et al.* 2006, Volkers *et al.* 2007).



**Figure 7.** Percentage of ambulatory prescriptions (y axis) according to the ATC groups classified as being labelled or OL (x axis)

The most commonly prescribed OL products came from the frequently prescribed ATC groups – systemic antibacterials, dermatological and respiratory system drugs as seen in the Table 17. Prescriptions for drugs which are OL because of lack of data counted for 98% of the prescriptions for genitourinary drugs in adolescents, consisting mainly prescriptions for hormonal contraceptives. Also, over half of the prescriptions for alimentary drugs had no information in the SPCs for children aged less than 12 years.

For children younger than 2 years the highest OL prescription rate was for topical corticosteroids, cetirizine oral drops and salbutamol syrup.

The most commonly administered OL/UL medicines in the ambulatory setting have similarly to us found to be salbutamol (Bazzano *et al.* 2009, Chalumeau *et al.* 2000, Jong *et al.* 2002, Morales-Carpi *et al.* 2010, Pandolfini *et al.* 2005, Radley *et al.* 2006), amoxicillin (Bazzano *et al.* 2009, McIntyre *et al.* 2000, Morales-Carpi *et al.* 2010, Radley *et al.* 2006) and also paracetamol (Kimland *et al.* 2012, Morales-Carpi *et al.* 2010). The latter was not documented in our study as we did not collect data on the use of OTC medicines.

**Table 17.** Most commonly prescribed OL products in ambulatory practice in Estonia described as a number of OL prescriptions per 1000 children in population

				Age	Age group			
ATC group	<2y		2–6y		6–12y		12–18y	
droid out	(n = 29 805)		(n = 53 105)		(n = 74.044)		(n = 120311)	
	Drug product / OL prescription rate		Drug product / OL prescription rate	ıte	Drug product / OL prescription rate		Drug product / OL prescription rate	
	Lipase+ amylase + protease				•			
	caps	12	Drotaverine tabl	4.9	Drotaverine tabl	9.4	Drotaverine tabl	12
Alimentary	Metoclonramide sunn	4	Lipase+ amylase +	4	Insulin asnart (Novomix®)	9 0	Insulin lispro	8
(A)	ddng anumidoraou	<u>:</u>	da acronal	<del>.</del>	( ) company to the company	ì	Omeprazol caps	9
					Short- and middle acting		(Omeprazol	
	Drotaverine tabl	2.1	Metoclopramide supp	2.9	human insulin (Mixtard®)	1.4	ratiopharm®)	2
Blood (B)	NR	NR	NR	NR	NR	NR	Tranexamic acid tabl	1.2
Cardio-	Trandolapril caps	0.7	NR	NR	NR	NR R	Trimetasidine tabl	1.8
vascular (C) NR	NR	NR	NR	NR	NR	NR	Nebivolol tabl	1.6
	Hydrocortisone +		Hydrocortisone +		Hydrocortisone +			
	chlorhexidine cream	207	chlorhexidine cream	09	chlorhexidine cream	18	Clindamycin topical sol	28
Dermato-					Mometasone cream /			
logicals (D)	Pimecrolimus cream	21	Pimecrolimus cream	30	ointment/ topical sol	13	Aselainic acid cream	42
	Fusidic acid cream		Fusidic acid cream		Betamethasone + fusidic			
	/ointment	27	/ointment	30	acid cream	12	Adapalene cream / gel	35
							Ddrospirenone +	
	NR	K	Oxybutynin tabl	1.2	Oxybutynin tabl	2.4	ethinyloestradiol tabl	09
Genitouri-							Gestodene +	
nary (G)	NR	NR	NR	NR	NR	NR	ethinyoestradiol	20
	e.	Ę	g.	Ę		Ę	Dienogest +	6
	NK	NK	NK	NK	NK	NK	ethinyloestradiol tabl	23

				Age	Age group			
ATC group	<2y $(n = 29.805)$ Drug product / OL prescription rate		2-6y $(n = 53.105)$ Drug product / OL prescription rate		6-12y $(n = 74 044)$ Drug product / OL prescription rate		12-18y $(n = 120 311)$ Drug product / OL prescription rate	
Systemic hormons (H)	NR	N.	NR	Ä	NR	NR.	Methylprednisolone tabl	0.8
Anti-	Sulfamethoxazole + trimetoprim syrup (L, but CRI for neonates)	123	Azitromycin tabl /caps	9	Amoxicillin + clavulanic acid tabl (Augmentin®)*	39	Amoxicillin + clavulanic acid tabl (Augmentin®)*	39
infectives (J)	Ceturoxime susp gran (L, but no data for neonates)	62	Amoxicillin + clavulanic acid tabl	4.3	Clarithromycin tabl	35	Clarithromycin tabl	9.4
	Cerprozii susp gran (L., but no data for neonates)	48	Clarithromycin tabl	4.3	Azitromycin tabl /caps	13	Ciprofloxacine tabl	8.2
Antineoplast ic (L)	NR	NR	NR	NR	NR	NR	NR	NR
M10	Diclofenac supp	4	Diclofenac supp	2.6	Diclofenac topical gel	0.7	Dexketoprofene tabl	7.5
skeletal (M)	NR	NR	NR	NR	NR	NR	Diclofenac topical gel	4.5
	NR	NR R	NR	NR	NR	NR	Glucosamine tabl/powder	4.5
	NR	NR	NR	NR	Nortriptyline tabl	2.2	Escitalopram tabl	
Nervous	NR	X.	NR	NR	Piracetam tabl	7	Citalopram tabl	3.1
system (N)	NR	NR	NR	NR	Sertraline tabl	1.3	Fluoxetine tabl	2.5
Antiparasitic (P)	NR	NR	Hydroxychloroquin tabl	2.9	NR	NR	NR	NR
	Cetirizine oral drops	254	Momethasone nasal spray	14	Desloratadine tabl	∞	Montelukast tabl	2.9
Respiratory (R)	Salbutamol syrup	156	Montelukast tabl	9.2	Cetririzine + pseudoephedrine tabl	4.2	NR	NR
	Ventolin resp sol (L, no data for neonates)	17	Beclomethasone nasal spray	7.9	Pseudoephedrine + loratadine tabl	2.4	NR	NR

				Age	Age group			
E	<2y		2–6y		6–12y		12–18y	
ATC group	(n = 29805)		(n = 53105)		$(n = 74 \ 044)$		(n = 120311)	
	Drug product/		Drug product/		Drug product /		Drug product/	
	OL prescription rate		OL prescription rate		OL prescription rate		OL prescription rate	
							Dexamethasone +	
	Chroramphenicol opth		Chroramphenicol opth				cloramphenicol opth sol,	
		99	drops	39	Chroramphenicol opth drops 10	10	ointment	7.5
Concount	Tobramycin opth sol,		Dexamethasone +		Dexamethasone +			
Sellsol y	ointment (L, no data for		cloramphenicol opth sol,		cloramphenicol opth sol,		Chroramphenicol opth	
Organis (5)	neonates)	39	ointment	18		8.5	drops	5.6
	Dexamethasone +							
	cloramphenicol opth sol,		Dexamethasone opth sol,		Dexamethasone opth sol,			
	ointment	17	ointment	5.7	ointment	4.2	NR	N.

Caps – capsules; gran – granules; NR, not relevant – the OL use of medicines in specific ATC group is low; opth – ophthalmic; sol – solution; supp – suppositories; susp – suspension; tabl – tablets;

Our results highlight that the following products could be included in the priority list of medicines needing paediatric trials:

- Dermatological drugs (D):
  - Topical corticosteroids and local antibacterials for <12y (hydrocortisone + chlorhexidine and fusidic acid products; pimecrolimus for <6y; betamethasone and mometasone products for >6 y);
  - Anti-acne products for adolescents (clindamycin, aselainic acid and adapalene topical products);
- Opthalmic drugs (S) for all age groups (chloramphenicol and dexamethasone products);
- Respiratory medicines (R):
   Antihistamine cetirizine oral drops for <2y;</p>
   Anti-asthmatic medicines: montelukast tablets for >2y;
- Alimentary drugs: metoclopramide supp <6y; lipase+ amylase + protease caps <6y; drotaverine tabl <6y; insulin analogues (aspart, lispro) >6y;
- Genitourinary medicines (G): urinary antispasmodics oxybutynin tablets for 2–12y and oral contraceptives for adolescents;
- Antiinfectives: Clarithromycin for 2–18y, azitromycin for 2–12y
- Nervous system drugs (N): nortriptylline tablets for 6–12v.

In addition, there are medicines which SPCs should probably just updated regarding the paediatric use according to the available literature data such as for the use of salbutamol syrup in children <2y and amoxicillin capsules for adolescents

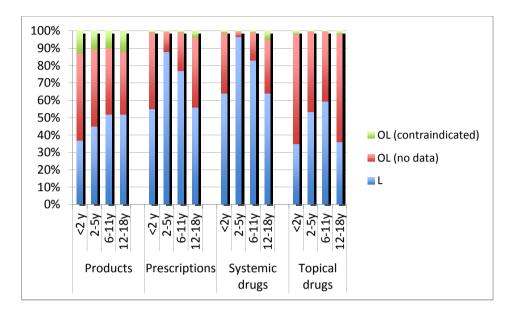
## 5.3.1.2. Ambulatory OL products vs. OL prescriptions and topical vs. systemic medicines

In all age groups, the proportion of OL prescriptions was lower than for OL products (Figure 8). This is a consequence of the lower prescription rate of the OL products when compared to the drugs with adequate labelling.

Also compared with topical drugs, a markedly smaller proportion of systemic agents (less than 40% in all age categories and 10% of prescriptions for the 2–5 years old) were OL for children (Figure 8). The proportion of OL topical drugs in our study was the highest for those under 2 years old and for adolescents—less than 40% of prescriptions had paediatric label.

It has been also described by others, that systemic drugs are less likely to be prescribed UL/OL than non-systemic (Chalumeau *et al.* 2000, Olsson *et al.* 2011, Schirm *et al.* 2003, Ufer *et al.* 2003b). The clinical relevance of this is debatable. On one hand, ADRs have been disproportionately more often reported on systemic than in topical drugs (Schirm *et al.* 2004). On the other hand, however, several cases of significant systemic absorption of topical and ophthalmic drugs leading to severe side effects have been observed (Dahshan & Donovan 2006, Hutcheson 2007, Phillips 2008). It is widely known that the relative systemic exposure of topically applied drugs in children may exceed

that of adults (Kearns *et al.* 2003), thus demonstrating a need to increase the available amount of information about the use of topical drugs in children.



**Figure 8.** Proportion of systemic (a) and topical (b) agents and products (c) / prescriptions (d) being labelled, OL due to the lack of data or contraindication

#### 5.3.2. OL medicines use in hospitalised neonates

OL medicines were an essential part of neonatal care – all preterm and 97% of treated term neonates received at least one OL/UL prescription suggesting that OL use in Estonia is in the upper end as compared to previous studies (48% – 100%)(Table 5).

Altogether 65% of prescriptions were for OL medicines (Table 19), which is higher than found in previous studies with the median rate of 49%, ranging from 28% (Neubert *et al.* 2010) to 59% (Barr *et al.* 2002) (Table 5).

While almost three-quarters (67/85, 72%) of drug products used in term neonates were OL, the respective rates in extremely preterm, very preterm and late preterm neonates were all >90% (respectively, 61/66, 92%; 62/66, 94%; 62/65, 95%).

The higher proportion of OL medicines found in our study could not be only explained by the methodological differences described previously in the review section.

The extent of UL/OL use in Estonian neonatal wards was found to be markedly higher than the general OL rate in the ambulatory setting. This is not surprising and is described by others that more OL prescriptions are seen in the neonatal, paediatric intensive care, oncology and haematology wards, compared

with primary care (Cuzzolin *et al.* 2006, Palčevski *et al.* 2012). This suggests that if paediatric studies are conducted they will mostly exclude patients with severe illness or at extreme age groups. However, namely in these populations the PK/PD of the drug is most unpredictable.

Among the preterm neonates, the markedly higher rate of OL medicines was seen in the group of late preterm neonates (Table 18). This phenomenon is not well understood. It may be that late preterm infants born at 34 through 36 GW are often the size and weight of term infants and may be managed as though they are developmentally mature as term neonates (Engle *et al.* 2007) affecting also the selection of medicines. In contrary to our results, higher prevalence of OL prescriptions have been found within the full-term neonates compared to pre-term neonates (DellAera *et al.* 2007).

**Table 18.** Number (%) of labelled (L), off-label (OL) and unlicensed (UL) medicines prescribed for hospitalised neonates according to the Estonian SPC

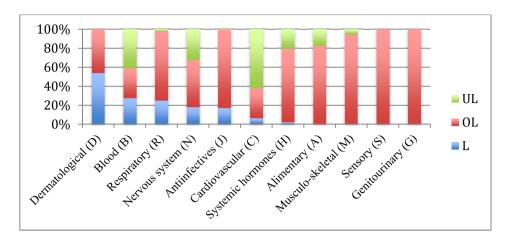
	Extremely	Very	Late		Total
	preterm	preterm	preterm	Term	
	neonates	neonates	neonates	neonates	
L	62 (10)	33 (9)	16 (4)	151 (24)	200 (10)
OL	369 (62)	249 (68)	300 (80)	369 (57)	1287 (65)
UL	165 (28)	85 (23)	60 (16)	122 (19)	432 (22)
Total	596	367	376	642	1981

#### 5.3.2.1. OL ATC groups and products for hospitalised neonates

The proportions of OL/UL prescriptions differed greatly between ATC groups (Figure 9). There were only 5 drugs labelled for preterm neonates – phospholipids (2.5% of prescriptions), midazolam (2.4%), epoetin beta (1.6%), ibuprofen (1.6%) and amikacin (0.1%).

All alimentary, genitourinary, musculoskeletal and sensory system drugs were used OL, whereas the proportion of OL prescriptions was the lowest among the dermatologicals, drugs for blood and blood-forming organs and respiratory medicines. Of the antibiotic prescriptions used to treat term neonates, 83% were for 7 different OL medicines. The highest proportion of OL prescriptions for previously mentioned drug groups has been also shown by others (DellAera *et al.* 2007).

Most commonly prescribed OL products in our study were gentamicin for all age groups, heparin for very preterm neonates and simeticone for very-, late-and term neonates (Paper III, Table 3).



**Figure 9.** Percentage of prescriptions to hospitalised neonates according to the ATC groups classified as being labelled (L), off-label (OL) or unlicensed (UL)

#### 5.3.3. Contraindicated medicines

Ambulatory. There were 2% of prescriptions for 106 products, which were contraindicated for paediatric use according to the SPC. For almost half of the products (42%) the contraindication was because of possible ADR in children. There was not enough experience or no clinical trials conducted in children for 29% of contraindicated products, in 22% the reason was not specified, in six cases (6%), the dose of the product was too high for children and in one product the excipients were not appropriate for children. The rate of medicines contraindicated because of the lack of paediatric clinical data was considerably higher than in our study in French (79%) and Germany (75%) (Bensouda-Grimaldi *et al.* 2007, Bucheler *et al.* 2002). Also in contrary to us, it has been shown that contraindication was seldom based on possible toxic effects in children (Bensouda-Grimaldi *et al.* 2007).

The proportion of contraindicated prescriptions was the highest amongst musculoskeletal (69%) and nervous system (16%) drugs. The same drug groups were often classified as OL because of contraindication also by others (Bensouda-Grimaldi *et al.* 2007, Olsson *et al.* 2011, Smith *et al.* 2012).

The most commonly prescribed contraindicated medicines are shown in Table 19. For pre-school children antiparasitic drug hydroxychloroquine (3/1000) and for older children selective serotonin receptor inhibitor escitalopram (6/1000) were most commonly prescribed CRI medicines. Anti-infectives also had one of the biggest proportions of contraindicated prescriptions for adolescents because of the prescription rate of 11/1000 for quinolones.

**Table 19.** TOP 10 most commonly prescribed contraindicated medicines, number of prescriptions per 1000 chi Idren in the population, reasons for being CRI according to the SPC and alternative with paediatric license if available

Active substance (ATC group)	Dra	Passons for CR1	Alternative with
Active substance (ATC group)	-511	NCASOLIS IOI CINI	Alicinative with
	scription		paediatric licence
	rate		
Dexketoprofen tabl (N)	6.2	Not tested in children	Ibuprofen
Ciprofloxacin tabl (J)	9	Not specified	Alternative AB
Escitalopram tabl (N)	4.9	No efficacy; increased risk of self harm and suicidal thoughts	NA*
Diclofenac gel (M)	3.9	Not enough data	NA
Norfloxacine tabl (J)	2.5	Not enough data, possible increased risk of tendon rupture	Alternative AB
Nortriptylline tabl (N)	2.5	No efficacy; increased risk of self harm and suicidal thoughts	NA*
Glucosamine tabl (M)	2	Not clinically tested in children	NA
Omeprazol caps (ratiopharm®) (A)	1.8	Not enough experience in children	Some products licensed
Etoricoxib tabl (M)	1.7	Not specified	Ibuprofen
Fluoxetine caps (N)	1.2	No efficacy; increased risk of self harm and suicidal thoughts	NA*
AD			

AB, antibiotics; NA, not available \* Drug from the same ATC group included into the EMA priority list for studies in children

Contraindicated respiratory system drugs were rarely used for older children, but the prescription rate in infants and toddlers was 24/1000 (containing mainly fusafungin spray). For pre-school children, contraindicated clemastine tablets (2/1000) were prescribed.

Of the musculoskeletal system medicines, mainly non-steroidal anti-inflammatory drugs (NSAIDs) were contraindicated. As an example, diclofenac suppositories were prescribed at a rate of 4/1000 for infants, the drug being indicated above the age of 1 year.

**Neonates.** There were only five contraindicated products used in neonates – diclofenac, drotaverine, metoclopramide, heparin sodium ointment and ursodeoxycholic acid tablets. They were used in small number of patients and none of these were prescribed for extremely preterm neonates, still most of these medicines are needed in neonatal pharmacotherapy and recommended by the guidelines.

#### 5.4. Extent of UL use of medicines

There were 0.05% of ambulatory prescriptions for six products (etosuximide capsules (Petnidan® and Suxilep®), salbutamol prolonged release tablets (Volmax®), fludrocortisone tablets (Florinef®), hydrocortisone tablets and vigabatrine tablets (Sabril®)) that had no MA in Estonia and were categorised as being UL. This is much lower than the median UL rate 16% in other studies (Table 4) ranging from 0.3 (McIntyre *et al.* 2000) to 16.8 (t Jong *et al.* 2004). As mentioned above here the UL definition plays the most important role, as all of the studies reporting high ambulatory UL rate have been conducted in The Netherlands and have classified medicines as being UL if the medicinal preparation was modified, drug lacked paediatric information or was contraindicated (Table 3). Also, as reported by the authors, the amount of prescriptions that is prepared by the Dutch pharmacies is approximately 5%, contributing also to the higher rate of UL medicines (Schirm *et al.* 2003).

The amount of UL drugs in the Estonian neonatal wards was in a contrary high (22% of prescriptions, and 25% of products used). This is again in the upper end of UL rate found in the literature review (range 6–29%, Table 5). As for a comparison, not a single UL medicine was used in the paediatric ward in Germany (Hsien *et al.* 2008). Differences between countries might reflect the variations in the national approval status. The higher proportion of UL medicines in neonatal wards could express the small market for specific medicinal products only used in neonatology leading to the lack of interest for drug companies to register these products. As an example, caffeine was used for treating apnoea in 29/41 extremely and 20/53 very preterm neonates and was UL in Estonia during the study period. Parenteral furosemide and heparin were the most commonly used cardiovascular drugs in term and extremely preterm neonates, and dobutamine was often used in preterm neonates for treating

hypotension associated with postnatal adaption and transitional circulation. All of these drugs were UL.

## 5.5. Availability of paediatric medicines information

Notable differences were found when paediatric information in the Estonian SPCs of the frequently used OL medicines was compared with other paediatric drug information sources. Discrepancies in paediatric drug information in different sources exist due to the following reasons:

- Principal differences of the source documents e.g. official information in the SPC vs. expert-opinion based sources such as BNFC;
- Regulatory discrepancies e.g. EMA and European indications in the SPC, BNFC and UK based indications, FDA indications in the Micromedex database

#### 5.5.1. Drug information for ambulatory prescriptions

Differences existed most often in nervous system medicines and anti-infectives. The main discrepancy between the information sources was due to different age-related indications/contraindications (Table 20).

There were several products containing the same active ingredient and present in the same pharmaceutical formulation, but produced by different drug companies having completely different paediatric information in the SPCs. For example, in the SPC of cetirizine oral solution, for the brand name Aceterine® (Hexal AG), the SPC states that the product is contraindicated for children aged under 2 years; whereas the SPC of Zyrtec® (UCB Pharma Oy) does not state such contraindication. The drug formulations, including excipients of these two products are exactly the same. According to the BNFC, cetirizine is not indicated for use in children aged less than 6 years except for 2–6 year olds for the treatment of seasonal allergic rhinitis. According to the Thomson Micromedex, cetirizine is indicated for children aged over 6 months for the treatment of perennial allergic rhinitis and also chronic urticaria. The 16<sup>th</sup> edition of Harriet Lane Handbook recommends cetirizine for children aged over 2 years without mentioning specific indications or contraindications.

Table 20. 20 most commonly prescribed OL medicines and the information in SPCs, BNFC and Micromedex

Tyrtec, Aceterin) (R)  nic acid granules  drops (S)  ies (M)  nay (R)  tabl (P)  (A)  nic acid tabl (J)			
	BNFC		Micromedex
unic acid granules ) drops (S) ries (M) )) ray (R) tabl (P) (A) unic acid tabl (J)	Zyrtec: not recommended<2y; NL <6y, doses for >1y Aceterin: CRI	doses for >1y	Doses for >6 months
unic acid granules ) drops (S) ries (M) )) ray (R) tabl (P) (A) unic acid tabl (J)		NL <2y, doses for >1 month	L >2y
drops (S) ries (M) ray (R) tabl (P) (A) unic acid tabl (J)	nded <2 months L, doses a older	L, doses for neonates and older	L <3 months and older
ries (M) )ray (R) tabl (P) (A) unic acid tabl (J)		L, starting from neonates	Safety & efficacy not established, doses for neonates given
ray (R) tabl (P) (A) unic acid tabl (J)	high $NL < 6y$		Safety & efficacy not established
tabl (P) (A) unic acid tabl (J) I)			$\Gamma > 2$
(A) unic acid tabl (J) J)	L > 1 month	ıth	L for malaria suppression
unic acid tabl (J) J)	L, startin	L, starting from neonates	Safety & efficacy not established, doses starting from neonates
(1		L, starting from neonates	L <3 months
		L, starting from neonates	L
	L > 6y		L adolescents
Escitalopram tabl (N)	NL for us	NL for use in children	Safety & effectiveness not established; doses >12y
Sulpiride tabl (N) CRI <14y	For Touret doses >2y	For Tourette syndrome doses >2y	NA
Sertraline tabl (N) CRI	NL for de for obsess disorder	NL for depression; doses for obsessive-compulsive disorder > 6v, doses for	For obsessive-compulsive disorder > 6y
	depression > 12y	n > 12y	
Clindamycin topical solution (J) Children not mentioned	nentioned L		Acne vulgaris: >12y

	4		i
Drug (ATC group)	SPC	BNFC	Micromedex
Drospirenone + ethinylestradiol tabl (G)	Children not mentioned	Т	Contraception: after menarche,
			same dose as adults; Acne vulgaris
			>14y
Dienogest + ethinylestradiol tabl (G)	Children not mentioned	T	NA
Adapalene cream (D)	Only information in SPC: not L, dose starting from	L, dose starting from	afety & efficacy not established
	tested <12y	neonates	:12y; for acne vulgaris >12y
Ciprofloxacin tabl (J)	CRI	L > 5y for pseudomonal	NL < 18y except for treatment of
		infections in cystic	anthrax and complicated urinary
		fibrosis & for other	tract infections
		children/other infections	
		where benefit outweighs	
		potential risks	

CRI, contraindicated; NL, not labelled; L, labelled, NA, not included into the handbook or database

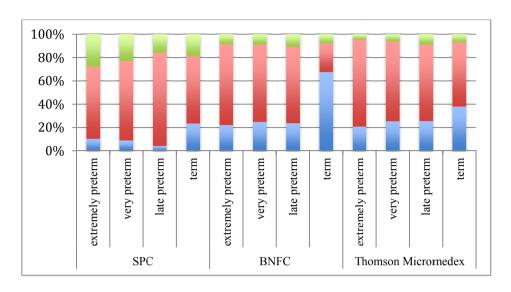
Another contradictory area in the SPCs is related to the recommendations for liquid and solid oral formulations. Although it is generally accepted but not thoroughly studied that children aged above 6 years are able to swallow tablets, the upper age for liquid formulation is often not specified or is much greater than 6 years. For example, amoxicillin/clavulanic acid (Amoksiklay® [Sandoz d.d.], Augmentin® [GlaxoSmithKline]) tablets are most likely suitable for children aged above 6 years, but the SPC dosing recommendations for adolescents were given only for powder for oral suspension. There was no reference to paediatric use in the SPC of Augmentin® tablets, at the same time the SPC of Augmentin® suspension granules gives dosing information starting from 2 months of age. These results are even more intriguing because amoxicillin clavulanate has been extensively studied in paediatric population; the MEDLINE database search for the term 'amoxicillin clavulanate' identified 265 randomised controlled studies conducted in the age group of 0–18 years. We believe that the SPCs should be updated, as the oral suspension may not be the best formulation for subjects who could otherwise swallow tablets. However, we accept that the prescription of amoxicillin clavulanate tablets to adolescents is OL legally and not medically, provided that the bioequivalence between the tablets and the liquid formulation has been demonstrated.

#### 5.5.2. Neonatal medicines information

Main licensing status variations between drug information sources for the medicines used in hospitalised neonates were encountered among term neonates (Table 21), while the amount of information for preterm neonates was equally scarce in all studied sources as presented in (Figure 10). Neonatal information was most frequently available in the BNFC and lacking in the SPCs. For term neonates, the information was available for 67%, 38% and 24% of prescriptions according to the BNFC, Micromedex and Estonian SPC, respectively.

Similar to older children great differences regarding the neonatal drug information in drug information sources in terms of specific drug products were found. For example, according to the SPC, metoclopramide is contraindicated for children less than 2 years of age. According to the BNFC it is not licensed for use in neonates as a prokinetic, however the doses are still given. According to the Micromedex metoclopramide is only licensed for intestinal intubation, but doses for neonates are given for treating gastroesophageal reflux disease (GERD). Metoclopramide is widely used as prokinetics in neonates despite the descriptions of several side effects and lack of evidence to support the use for GERD in infants (Hibbs & Lorch 2006).

Povidone iodine ointment is licensed according to the SPC, has no directions for using in neonates according to BNFC and Micromedex and is contraindicated for preterm neonates according to the BNFC. Micromedex warns against using povidone iodine, as significant transcutaneous absorption of iodine may occur after the topical application in infants and raised plasma iodine levels could interfere with metabolic and thyroid function (Hudaoglu *et al.* 2009).



**Figure 10.** Neonatal labelling status according to SPC, BNFC 2009 and Thomson Micromedex database

Blue bars – L; red bars – OL; green bars – UL

**Table 21.** Neonatal drug information according to BNFC 2009 and Thomson Micromedex database (TMD) for ten most often used drugs in preterm and term neonates. Blue boxes – L; green boxes – OL; white boxes – UL

	Preterm ne	eonates			Term neonates			
		SPC	BNFC	TMD		SPC	BNFC	TMD
1	Gentamicin				Gentamicin			
					Dimeticone			
2	Ampicillin				/Simeticone		, i	
3	Heparin				Ampicillin			
	Dimeticone							
4	/Simeticone				Benzylpenicillin			
5	Fentanyl				Fentanyl			
	Laurylsulphate +							
6	sodiumcitrate				Furosemide iv sol			
7	Furosemide iv sol				Salbutamol			
8	Dextriferrone				Midazolam			
9	Dobutamine				Heparin			
10	Fluconazole				Paracetamol supp			

Parenteral heparin, preserved with benzyl alcohol (BA), is used UL in Estonian neonatal units as it has no local or central EU MA. Some preparations containing no BA are licensed in children according to the BNFC, and Micromedex, but it is stated that solutions preserved with BA should not to be used in neonates as BA has been related to the "gasping syndrome" (Thomson Reuters Micromedex 2.0). The neonatal safety issues with pharmaceutical excipients are further discussed in the following section 5.6.

## 5.6. Extent of excipient use

In total 93 of 107 medicines (87%) and 1620 of 1961 prescriptions (83%) contained at least one excipient. The total number of different excipients was 123.

### 5.6.1. Classification of excipients

One third of excipients (42/123) was classified as potentially safe (Category 1, described in Table 11).

Another third (47/123) was classified as potentially harmful (Category 2), including eight excipients already known to be harmful in neonates e.g. parabens, saccharin sodium, sodium benzoate, benzyl alcohol, benzalkonium chloride, propylene glycol, polysorbate 80 and ethanol.

For the remaining 34 excipients human safety / toxicity data was not found in the literature (Category 3) or the chemical entity of excipient was not described in the SPC thus allowing not conducting the literature search (15/34; Category 4) (Paper III, Table 2). Many of the excipients of the previous category were flavouring agents such as banana, strawberry, raspberry flavour etc.

## 5.6.2. Neonatal exposure to excipients

Almost all treated neonates (339/348; 97%) received medicines with at least one potentially harmful excipient (Category 2) and as many as 88% (307/348) received at least one of the eight excipients known to be harmful in neonates (Paper III, Table 2).

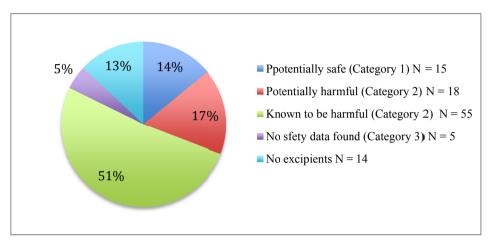
The proportion of medicines containing potentially harmful excipients in preterm neonates was even higher in our study than the general rate -77%. At the same time the percentage of used medicines that contained only potentially safe excipients was the same in both populations (22%).

## 5.6.3. Presence of potentially and known to be harmful excipients (category 2) in the medicines

From the medicines prescribed, the median number of included excipients known to cause harm in neonates was two (interquartile range (IQR) 5–2; pre-

term neonates median of 3, range 1 to 15, IQR 4–2; term neonates median of 1, range 1 to 11, IQR 3–1).

As illustrated in the Figure 11 approximately two thirds (73 products /107, 68%) of all the medicines used contained at least one category 2 excipient including 31/107; 31% containing at least one known to be harmful excipient. The median number of category 2 excipients per medicinal product was two and maximum was five (in simeticone oral suspension).



**Figure 11.** Proportion of prescribed medications to neonates, containing at least one excipient, in each safety category (every drug is listed once according to the worst-case scenario – into the most harmful category).

The most common excipients that are known to cause harm were propylene glycol and ethanol, both present in seven products. In relation to prescription frequency, the most common excipients known to cause harm were parabens (methyl- and propylparahydroxybenzoate) used as preservatives in the most commonly used medicine – parenteral gentamicin, which was given to 57% of treated neonates. However, a paraben-free gentamicin product is also registered in Europe. The gentamicin product also included another potentially harmful excipient, namely sodium metabisulphite (Table 22).

With this our data are in line with van Riet-Nales et al. who also showed that for 22% of oral liquid paediatric medicines contain potentially harmful excipients. Whilst at the same time an alternative formulation lacking the potentially harmful excipient being available with the same active chemical entity (van Riet-Nales *et al.* 2011). This may indicate that health professionals have a low awareness on safety of excipients.

**Table 22.** Most commonly prescribed medicines (received by >10 neonates) containing known to be harmful or potentially harmful excipients

Rank	Active substance, drug formulation	No of Pre- scrip- tions	Potentially harmful or known to be harmful excipients	
1	Gentamicin, inj solution	200	Parabens, sodium metabisulphite	
2	Simeticone, oral suspension	108	Sodium benzoate, saccharin sodium, silicium dioxide, sodium cyclamate, sorbic acid	
3	Heparin, inj solution	86	Benzyl alcohol, Parabens	
4	Laurilsulphate + Sorbitol + Sodium citrate, rectal solution	60	Sorbic acid	
5	Salbutamol, nebulisation solution	54	Benzalkonium chloride, propylene glycol	
6	Dobutamine, inj solution	45	Sodium metabisulphite	
7	Epinephrine, inj solution	36	Sodium metabisulphite	
8	Iron, oral solution	32	Parabens, saccharin sodium	
9	Budesonide, nebulisation solution	31	Polysorbate 80, disodiumedetate	
10	Chloramphenicol, opthalmic solution	29	Benzalkonium chloride, polysorbate 80, borax, boric acid	
11	Caffeine, solution	29	Sodium benzoate	
12	Phenobarbital, tablet	29	Silicium dioxide, gelatin	
13	Paracetamol, suppository	29	Disodium hydrogen phosphate	
14	Piperacillin+ tazobactam, inj solution	25	Disodium edetate	
15	Paracetamol, inj solution	24	Disodium hydrogen phosphate	
16	Hydrocortisone, inj solution	23	Benzyl alcohol, disodium hydrogen phosphate	
17	Epoetin beta, inj solution	22	Disodium hydrogen phosphate, glycine, calcium chloride dihydrate, leucine,	
18	Ibuprofen, inj solution	21	Trometamol	
19	Hyoscine butylbromide, tablet	20	Silicium dioxide	
20	Spironolactone, tablet	18	Silicium dioxide	
21	Zidovudine, oral solution	17	Sodium benzoate, saccharin sodium	
22	Fusidic acid, ophthalmic solution	16	Benzalkonium chloride, disodium edetate	
23	Morphine, inj solution	14	Sodium metabisulphite	
24	Phenobarbital, inj solution	13	Benzyl alcohol, propylene glycol	
25	Heparin sodium, topical gel	12	Parabens, ethanol, trietanolamine,	
26 Inj. in	Insulin, inj solution	11	Cresol	

Inj – injection

Simeticone oral suspension was the second most commonly prescribed medicine, given to 31% of neonates. The simeticone product contained two excipients known to cause harm – saccharin sodium and sodium benzoate, and also three other potentially harmful excipients – colloidal anhydrous silica, sorbic acid and sodium cyclamate (Table 22).

Two products contained 3 known to be toxic excipients – cetirizine oral drops (parabens, saccharine sodium and propylene glycol) and miconazole ointment (parabens, polysorbate 80, ethanol). The number of different potentially toxic excipients to which neonates are exposed is not studied before, but it has been shown that on paediatric wards some products contained up to five potentially harmful excipients (Cordner *et al.* 2012).

The proportion of medicines containing potentially harmful excipients in our study is higher than the recently published in the Netherlands where 52% of oral liquid formulations and 7% of all parenteral products for the entire paediatric population were containing some toxic excipients (van Riet-Nales *et al.* 2011). This difference is most likely explained by the methodological variations, regional characteristics in marketed product ranges and by differences in classifying excipients into the toxicity categories. In the Dutch study only "known to be toxic" excipients were taken into the analysis while in our study a very conservative approach was taken and the excipients were classified into the "potentially harmful" category even if only some data on human toxicity had been published (also when used as a substance) as one could not assure that the same agent does not cause any harm when used in small quantities as an excipient.

Approximately two thirds of parenterally used products (29/47) contained some potentially harmful excipients. The situation was even worse for other drug formulations – all of the prescribed rectal, topical, inhalation, oral solutions and oral suspensions contained at least one potentially harmful excipient. The use of topical agents in neonates was rare, only 8/33 products contained excipient known to be toxic to neonates. Only one of the 19 orally administered solid drug formulations and one of the five ocular formulations were free of potentially harmful excipients. Not surprisingly, most of medicines free from potentially harmful excipients were parenteral single-dose antibacterial or antifungal formulations (13/ of all the 35 medicines without harmful excipients).

A total of 19 medicines were licensed for use in neonates (6 for preterm and all for term neonates). Approximately half of them (3/6 in preterm and 8/19 in term neonates) contained at least one potentially harmful excipient. For example epoetin beta product contains leucine, which is moderately toxic by the subcutaneous route, glycine which is moderately toxic by the intravenous route and mildly toxic by ingestion, disodium hydrogen phosphate that can cause gastrointestinal disturbances including diarrhea, nausea, and vomiting when used as an excipient and calcium chloride dihydrate which is toxic by subcutaneous route and can also cause dermatitis (Rowe *et al.* 2009). It has also described by others that the paediatric medicines may not be age-appropriate concerning the excipients even if the drugs are authorised for use in children (van Riet-Nales *et al.* 2011).

The amount of the excipients in the drug formulation was present in the SPCs for only two medications (metoclopramide injection solution and esome-prazole powder for injection). The detailed characteristics of excipients and their potential safety issues are described in Paper III, Table 3.

## 6. GENERAL DISCUSSION

## 6.1. Studies on the paediatric prescription pattern and OL medicines use

Paediatric medicines use has been abundantly studied in recent decades as the creation of healthcare databases has broadened the possibilities for pharmacoepidemiological studies. However, due to the high heterogeneity among the paediatric drug utilisation studies, the systematic and continuous monitoring of the drug use in children by conducting multinational collaborative studies is still a burning need to improve the rational use of drugs in children (Clavenna & Bonati 2009). With our study we demonstrate that cross-national analyses of drug utilisation data can aid in highlighting the possible flaws in pharmacotherapy such as in our case the great difference in antibiotics use between Estonia and Sweden despite the similar resistance profile of most common pathogens. On the basis of our results, the prescribing of antibiotics in Estonian children may not always be appropriate and these results should motivate initiatives with the aim of improving antibiotics prescribing.

As one of the subsections of the pharmacoepidemiological studies, the OL medicines use has been studied extensively during the last number of years. As a result, the current OL status of the many commonly used medicines in paediatrics has been meticulously proven for different kinds of treatment settings and regions. With our studies we show that the OL medicines use rates in an Eastern European country are broadly similar with the results of the studies conducted in the Western Europe, thus the further studies focusing on the general OL use rates are apparently of no great value. We suggest that the differences in OL between various studies (Tables 4 and 5) are not caused by the interregional differences but are mainly driven by different methodology and most of all by differences in the definitions used.

# 6.2. Evidence-based paediatric drug information – from where should it come?

Licensed medicines represent the gold standard for treatment quality, safety and efficacy. In comparison to adults, children are commonly treated with medicines that are not studied in the paediatric population and are thus often with unknown safety and efficacy profile. As we are also exhaustively showing, these medicines generally lack official paediatric drug information and are used solely based on the expert opinion.

There are strict recent regulations for the drug companies while acquiring marketing authorisation for a new medicine, such as need for PIP. As a result, in the 2 years after the acceptance of the Paediatric Regulation, 564 PIPs / waivers were submitted by the pharmaceutical companies, covering nearly 870 indications (Rocchi *et al.* 2010). By the end of 2011 the evaluation of 682 PIPs

was completed by the PDCO, of these 476 opinions (70%) resulted in an agreement of a PIP and 29 PIPS were completed. The completed PIPS have been leading to new paediatric indications for 24 medicines and to a drug formulation appropriate for the children for 7 medicines. Thirty-four new medicines have been centrally authorised since 26 January 2007 with a paediatric indication at the time of initial MA, out of these 7 were authorised for a use only in the paediatric population (http://ec.europa.eu/health/files/paediatrics/2012-09\_paediatric\_report-annex1-2\_en.pdf).

It was stated more than 10 years ago that when a drug is already extensively used there is no commercial incentive for a pharmaceutical company to seek an amendment to the product licence (Turner et al. 1998). From our studies the examples of such OL "old" medicines are diclofenac, metoclopramide or drotaverine and there are around 1000 products authorised for adults but used also for treating children on the market in Europe at the present time (Kimland et al. 2012). Inadequate paediatric labelling of drugs is often attributed to the lack of scientific documentation in children due to the lack of clinical trials. However, in some cases, the available evidence outside the drug labelling might be sufficient to extend the indications to children without further clinical studies. For example, of five proton pump inhibitors (PPI) marketed in EU only omeprazole has a paediatric indication, but in US 3 out of 5 are authorised for children. Still, despite the lack of paediatric data in SPC, the paediatric PK, efficacy and safety data of PPIs in the age ranges that are not covered by SPC is available in the literature (Tafuri et al. 2009). Similarly, we conclude that high rate of OL medicines use is probably the combination of missing clinical study data and nature of the regulatory approval process delaying the reflection of study results in the SPC. For example when searching in the PubMed database (accessed on 19 August 2012) using the key words "neonate", "pharmacokinetics" and "gentamicin", we identified 201 publications, several of which provide dosing recommendations. However, there is still no mention of neonates in the Estonian SPC (http://193.40.10.165/SPC/Hum/SPC 12524.pdf, confirmed in the Estonian State Agency of Medicines in March 2011). It would appear that regardless of the number of studies, the dosing recommendations and safety data are still not readily available to physicians. Furthermore different dosing recommendations for gentamicin are given in various guidance documents (e.g. BNFC, NeoFax, Textbook for Paediatric Infectious Diseases) for neonates, which may also confuse the prescribers.

It has been suggested that the review of the SPCs of some drugs, together with the monitoring of clinical practice and with new clinical research, may be a step forward to reduce the OL use in children (Marchetti *et al.* 2007). A system how to increase the availability of official paediatric medicines information for the "old" OL medicines that have been used for years is currently established through the Paediatric regulation (PUMAs) and EU FP7grants. In order to update the SPC with the relevant paediatric information, the EU Paediatric Regulation states that paediatric studies that have not previously been assessed by the authorities "shall be submitted by the MA holder for assessment to the

competent authority" (Paediatric Regulation, articles 45 and 46). The competent authority may then update the SPC and may vary the MA accordingly (Kimland *et al.* 2012). According to the EMA 5-year Report, up to the end of 2011 more than 18,000 paediatric studies (also published studies) of about 1000 active substances have been submitted to the PDCO by the Marketing Authorisation Holders and the assessment of these studies has resulted in 65 SPC changes. Also the development of 20 off-patent medicines for paediatric use was funded by the EU 7<sup>th</sup> Framework programme (http://ec.europa.eu/health/files/paediatrics/2012-09 paediatric report-annex1-2 en.pdf).

Recently, a national law was adopted in France with the aim of strengthening the safety of medicines called "Temporary Recommendations for Use" (TRUs). This law provides a regulatory process for temporarily supervising the prescribing of medicines for indications for which they are not yet licensed. A TRU is issued a single time for a medicine for 3 years, it allows to assess the benefits and risks of a marketed drugs for an unlicensed indication, to collect scientific information and gives pharmaceutical companies the responsibility for controlling the OL prescribing. Companies must monitor prescriptions' adherence to MAs and if unconventional prescribing is observed, they must inform the National Agency of Medicines (Emmerich *et al.* 2012).

In an ideal world similarly to the pharmacotherapy of adults the SPC would also be the leading source of drug information for the treatment of children. Still, taking into account the limitations of the officially approved SPC, which is mainly a manufacturer-lead uni-directional provision of clinical trial based information (or often a statement of the lack of this information) and, on the other hand, the comprehensive information management of the selected medicines formularies such as BNFC, the choice of the drug information source by the practitioner and accordingly the drug dosage for children probably remains an "educated guess" also in the near future.

## 6.3. Prioritisation of paediatric medicines research

An important aim of the OL/UL studies is to show in detail which medicines, groups of medicines or specialties need to be inserted into the paediatric priority lists with the highest need to be studied. As the prescribing habits may vary between countries and settings, also the list of priority medicines may differ and results of a new OL/UL use study either affirm the list or add new priorities. Still, one of the important flaws of the OL/UL medicines use studies is the lack of uniform definitions leading to the incomparable study results restricting the straightforward transformation of study results to the universal paediatric priority list.

There are two recently published lists of paediatric priority medicines having different aims and also content. Global Model List of Essential Medicines for Children intended for use for children up to 12 years of age by the WHO (http://whqlibdoc.who.int/hq/2011/a95054 eng.pdf) comprises of data from 89

unique country priority lists. It represents a list of minimum medicine needs for a basic health-care system, listing the most efficacious, safe and cost-effective medicines for priority conditions. The medicines were selected on the basis of global burden of disease and the evidence of efficacy and safety for preventing or treating maternal, neonatal, and child mortality and morbidity. The list includes medicines for treating pneumonia, diarrhoea, malaria, vitamin A deficiency, medicines for paediatric palliative care, HIV/TB prophylaxis and medicines for neonatal care (Hill *et al.* 2012).

According to the EMA revised priority list for studies into off-patent paediatric medicinal products published in January 2012 (http://www.ema.europa.eu/docs/en\_GB/document\_library/Other/2009/10/WC500004017.pdf), the following areas are always considered to be of high priority: development of age-appropriate drug formulations, data in neonates, in infants with oncological conditions and for refractory paediatric epilepsy syndromes. It has also been shown by investigators that children from 2 to 6 years receive significantly more often than other age groups of medicines that are contraindicated due to the inappropriate drug formulation and infants tend to receive the drugs which are contraindicated for their age on the basis of toxic effects (Bensouda-Grimaldi *et al.* 2007) confirming the recommendations from the priority list.

The EMA priority list for off patent medicines used in children is a basis for the 7<sup>th</sup> Framework Programme of the European Commission, which the manufacturing companies can apply for funding studies for medicines, which are in the list.

The priority list should provide guidance on which medicines are the most important to be studied. Still, it is acknowledged that the identification of the priorities for the research into the medicinal products for paediatric use is partly based on subjective criteria and that the identified priorities may change over time (van Riet-Nales *et al.* 2011). The country-specific and systematic studies of the OL/UL use of medicines are therefore helpful for improving the priority list.

In our studies we identified that the most commonly prescribed OL products come from the frequently prescribed ATC groups – systemic antibacterials, dermatological and respiratory system drugs. This highlights also the general priorities of including these ATC groups in the priority lists in addition to the less commonly used medicines for which the paediatric clinical data is lacking.

Our results are supported by the Olsson *et al.* who suggested that topically used medicines should be considered in greater need of paediatric clinical studies (Olsson *et al.* 2011) and also by the European survey of the paediatric medicines use (http://www.ema.europa.eu/docs/en\_GB/document\_library/Report/2011/01/WC500101006.pdf) which states that among others, the most frequent OL medicines are antiasthmatics and antimicrobials (macrolides, betalactams plus betalactamase inhibitors and carbapenems).

However, we believe that the most commonly used OL medicines should be critically evaluated before adding new medicines to the priority lists. For example, according to our results, instead of including the commonly used beta-blocker nebivolol, which is OL for children to the list, the use of the licensed

medicine metoprolol from the same drug group could probably be recommended in the clinical practice. Also the contraindicated dexketoprofen should not be added to the priority list but rather be substituted in the clinical practice with the NSAID labeled for the use in children such as ibuprofen. The use of contraindicated prescriptions is certainly inappropriate if the labelled alternative exists within the same therapeutic group.

To conclude, the clinical studies are mostly needed for the most commonly used OL medicines and also for those in which no alternatives in paediatric pharmacotherapy exist.

#### 6.4. What to do with the UL medicines?

The UL rates in different studies have been found to be even more erratic than OL rates. However, again the UL definition could have various meanings. For example, the drug formulation needs to be modified before it can be administered to child (Gavrilov *et al.* 2000), medicine is not recommended to be given to a child (Serreau *et al.* 2004) or the drug product has no marketing authorisation in the country where the study is conducted, but it is licensed for use in an other country (Turner *et al.* 1998). All of these previously mentioned reasons for medicines being UL need different handling and solutions for reducing the UL use rates.

Similarly to most other studies (Table 3) we classified medicinal product UL if the product had no MA in Estonia nor centrally in the EU. Chemicals that were prepared into a formulation within the hospital pharmacy were also categorised UL. Generally the UL medicines lack the official drug information (SPC) and are supplemented solely with patient information sheets, which are not in local language. The number of such medicines was remarkably high (22% of prescriptions, and 25% of products) in the neonatal units highlighting the need for regulatory action.

We show that the UL prescribing is a significantly larger problem in the neonatal pharmacotherapy compared to the paediatric ambulatory practice. However, very few of the UL medicines were specific for neonates such as vitamin K and caffeine. Most of the UL medicines are also used in adults (are thus also UL in adults), to mention only a few – atropine, furosemide, heparin, fenobarbital or petidine injection solutions. Unfortunately none of these products have either a central EU marketing authorisation.

If there are no alternatives for the substitution of the UL medicines with the licensed medicines in clinical practice, one way forward in reducing the UL medicines usage rates could be the implementation of regulatory initiatives. These initiatives could force the manufactures of such medicines to apply for a MA or at least to make available the clinical trial documentation. As a result the respective regulatory authorities could then provide an official guidance on the use of the specific product in the clinical practice.

# 6.5. Drug formulation excipients and safer neonatal pharmacotherapy

We show that hospitalised neonates often receive medicines with potentially harmful drug formulation excipients. However, despite the existing literature reports about the possible ADRs of pharmaceutical excipients in children, this area has up to now received no appropriate attention, as the excipients were relative recently called inactive ingredients of the drug formulation. Therefore, the awareness of the potential problems with the excipients, especially in neonates has remained low in the medical community. We aimed to increase the awareness and have highlighted that in addition to the active ingredients medicines also contain a lot of excipients which may cause side effects especially in neonates (e.g. ethanol, propylene glycol and benzoic acid).

To date very few medicines have been designed with the needs of the neonates in mind and there are few direct data on the safety of specific excipients in infants (Nunn & Williams 2005). Still, due to the immature metabolizing systems, excipients that are not harmful to older age groups could be harmful to neonates even in very low doses. It is possible that even if the excipient is known to be harmful, the daily intake will not exceed the toxic threshold due to the small quantities used in drug formulations. The general lack of quantitative information of the excipients amount in the SPC limits the possibility of the practitioner to make an informed decision. For example, from using a parenteral gentamicin product, a premature infant weighting 500g and receiving a daily dose of 2mg gets a maximum of 0.1mcg of parabens (methyl- and propylparahydroxybenzoate, parenteral formulations contain up to 0.75% parabens). When comparing this value to the allowed daily intake of 10mg/kg body weight in adults it is obvious that the quantities are far below the toxic threshold. However, the fact that in neonates organs and thus the PK pathways are not fully matured may change the situation drastically (Fabiano et al. 2011).

Up to now, even the toxicity of known toxic excipients has not been clearly proven in clinical practice. Thus it has not been established how extensive is the possible clinical harm that may be caused by the formulation excipients. For example, Allegaert *et al.* showed recently that a short duration of unintended propylene glycol administration at a median dose of 34 mg/kg over 48 hours was well tolerated by (pre)term neonates (Allegaert *et al.* 2010). However, the authors stress that the long-term safety of propylene glycol is still not established. We believe that the well-known toxic or potentially harmful excipients need careful safety assessment and determination of the PK/PD profiles in neonates.

There is an increasing trend for the companies producing cosmetics to remove the unwanted excipients from their products. For example, Johnson and Johnson are removing all excipients from their baby care products, including parabens. If this would also happen in the pharmaceutical industry, a substitution in clinical practice between the generic products free from potentially toxic excipients could be possible while treating neonates.

One way to reduce the neonatal exposure to the potentially toxic excipients could be the therapeutic substitution of medicinal products containing only potentially safe excipients. The possibility of substitution will be hopefully bv the European Study of Neonatal Exposure (ESNEE, http://www.esnee.eu/index.html) project, which is partly taking place also in Estonia. As a part of the project, service evaluation questionnaire was carried out to collect the list of medicinal products used in the European neonatal intensive care units. The excipient content of the almost 2000 different medicinal products reported was collected using the SPCs and PILs. The preliminary results show several options for substitution, for example the currently used gentamicin product could be substituted by the parabens-free product. However, before these results are published, withholding the medicines is at the moment often the only means of avoiding exposure to the excipients in neonatology.

## 6.6. Limitations of the study

Some limitations of the studies should be noted, which in our opinion do not affect the general reliability of the results.

In the studies for ambulatory medicines use we were not able to register over-the-counter drug use, but only prescription medicines. Thus we are showing the usage pattern only for the prescription medicines.

The main weakness in the antibiotics use study comes from the fact that the Swedish data collection is not diagnose-linked so we were not able to assess the guideline adherence in Sweden. Nor was it possible to describe the between-country variability of the dose regimens and of the duration of treatment. In order to study the between-country variability in treatment practices including the choice of antibiotics for different conditions, a prospective study would be required.

We also only captured ambulatory data collected within 1 year and thus were unable to analyse the trends in the prescription medicines and also in the systemic antibacterials use. However, the drug prescription pattern is found to be relatively stable, and even if changes occur, they are seen between specific drugs rather than between drug classes.

The major limitation to the neonatal medicines use study is that we addressed a subsection of the issue of the OL use in neonatology, as only the drugs prescribed to the hospitalised neonates were included. However, we believe that these limitations did not obviate the adequacy of our conclusions on neonatal drug exposure rates and on OL use in Estonia. We did collect data about the doses and duration of the treatment, but were unfortunately not able to use this information as the doses expressed per body weight often change daily in neonates.

The most important limitation of the excipients exposure study is the lack of the information on the exact amounts of excipients in the medicines, which precludes us making any conclusions on the quantitative excipient exposure. This limitation was beyond our control because manufacturers do not disseminate this information. The other challenges are the use of a novel and non-validated classification system and the restriction of the study to one country only. We did not collect information about the dosage regimens since this would have been un-interpretable in the absence of the quantitative information about the excipient content of the prescribed medicines. Another issue, possibly characteristic also to other small markets, was the significant use (22%) of unlicensed medicines and thus the unavailability of the SPCs. In these cases the excipient content was recorded according to the package insert leaflets. Although we appreciate that only excipients of intravenous, topical and ophthalmic products and known to be toxic excipients have to be declared in the package leaflet, we assume that this will not significantly affect our conclusions. Finally the study was conducted in a small country and thus these results cannot be generalised to other countries. These limitations do not undermine our findings that neonates are frequently exposed to a range of potentially harmful and known to be toxic excipients.

## 6.7. Suggestions for future research

Taking into account the various methodological problems in the OL/UL medicines use studies such as various definitions and study methodologies used, we believe that the future studies on the OL/UL use of medicines in children should rather be prospective studies with the focus on the real clinical impact of the OL/UL medicines use in children. For example, what is the impact of the OL/UL use to the efficacy and safety of the paediatric medicines or to which extent the OL/UL use of medicines in paediatrics could be avoided. For the OL medicines, it should be detected whether there is a real lack of clinical data in the literature or there is a need for the SPC update while selecting the medicines into the priority list.

As discussed above numerous clinical studies have already been performed with some agents and there is hardly any need to conduct another study. Thus, instead of conducting another PK study, a meta-analysis of all existing data together with the re-analysis of the already collected data by using population kinetics and modelling could be a step forward in providing appropriate dosing and safety information to practicing physicians.

Also, before the discussions into the reformulation of medications with safer excipients for neonatal use start, the possible harm from excipients must be balanced against the positive effect of the medicine and the hazard (how does the excipient harm the child) must be adequately characterised. Therefore, further studies should make a clinical link between the excipient exposure and outcomes focusing on the excipients disposition (PK), clinical consequences associated with the excipient exposure and the level of safe exposure, including the long-term safety data in neonates.

## 7. CONCLUSIONS

- I The reports of paediatric ambulatory prescription and in-hospital medicines use show that a substantial amount of medicines are prescribed to Estonian children. This highlights the need for in-depth diagnoses-linked pharmacoepidemiological studies in more commonly prescribed pharmacotherapeutic subgroups for ensuring the rationality of paediatric pharmacotherapy.
- II Significant qualitative and quantitative differences in ambulatory antibiotics use between Estonian and Swedish children exist. The higher rate of antibiotic consumption in Estonia and the apparent high use of broadspectrum antibiotics emphasises the need for national activities similar to the Swedish STRAMA programme in order to prevent misuse of antibiotics. Thus, auditing activities should focus on rational use of antibiotics and compliance to evidence based guidelines.
- III Compared with Western Europe the rates of OL / UL medicines use in the ambulatory and hospital setting in Estonia are similarly high. Larger proportion of topical than systemically administered medicines was OL. Also children under 2 years received OL medicines more often than older age groups. This is showing a priority of including the younger paediatric age groups and topical drugs into the priority list of medicines that need to be studied in children.
- IV There were very few ambulatory prescriptions for UL medicines. The prescription rate of UL drugs in most vulnerable group hospitalised neonates was in a contrary high (22% of prescriptions, and 25% of products used), indicating the lack of medicines with local marketing authorisation needed for treating hospitalised neonates. Clinical trials in neonatal population and regulatory initiatives forcing the manufactures of such medicines for applying MA could ease the situation.
- V The majority of prescriptions were classified OL due to the lack of data on the paediatric / neonatal use in the SPC. There is a distinctly higher availability of information in the paediatric handbooks (e.g. BNFC) and databases (e.g. Micromedex) compared to the official documents (SPC). As for many OL medicines the literature search reveals substantial amount of paediatric studies, our results shall bring the attention of the authorities to the need for taking action in updating the SPCs. The reasons for a drug not being recommended for paediatric use should be provided to inform the practitioners and to avoid ineffective and potentially dangerous use of medicines in children.
- VI One third of excipients used in hospitalised neonates were classified as potentially harmful but of these only eight have been previously classified as known to be harmful in neonates (e.g. parabens, saccharin sodium, sodium benzoate, benzyl alcohol, benzalkonium chloride, propylene glycol, polysorbate 80 and ethanol). There is a need for validated classification system regarding the potential neonatal toxicity of excipients.

VII As almost all treated neonates received medicines with at least one potentially harmful excipient, there is an urgent need for the careful toxicological assessment of excipients as the information in the published literature is extremely limited. Information about the possible harm resulting from excipients and also the quantitative data regarding the excipients amount in specific drug products should be made available to pharmacists and neonatologists. This will assist the selection of the most appropriate medicines for neonates. When excipients cannot be avoided, professionals should have access to quantitative and qualitative information that allows them to assess risk, substitute products while toxic-excipient free products are available and monitor vulnerable patients appropriately.

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## 9. SUMMARY IN ESTONIAN

## Ravimikasutuse epidemioloogilised ja kliinilised aspektid Eesti lastel

Lapsed moodustavad suure osa kõigist ravimite tarvitajatest, kuid võrreldes täiskasvanutega on nende ravimine sageli keerulisem. Kuna lastel on ravimiuuringuid tehtud oluliselt vähem kui täiskasvanutel, ravitakse lapsi sageli vaid täiskasvanutel uuritud ravimitega. Sellisest olukorrast tingituna on kasutusel kaks mõistet:

- näidustuseta ravimid (ingl. k. off-label, OL) ravimit kasutatakse erinevalt ravimiomaduste kokkuvõttes märgitust (näiteks erineval näidustusel, vanuserühmal, annuses ja/või manustamisviisil) või on ravim lastele vastunäidustatud;
- litsentseerimata (ingl. k. *unlicenced*, *UL*) ravimid pole Euroopa Liidus kasutamiseks registreeritud ei täiskasvanutele ega lastele.

OL ravimite kasutamine on Lääne-Euroopas ja Põhja-Ameerikas levinud (Kimland *et al.* 2012), kuid vastavad andmed Ida-Euroopa kohta seni puudusid.

Täiskasvanutele mõeldud ja vaid täiskasvanutel uuritud ravimid või ravimite annused ei sobi alati laste ravimiseks. Lapsed ja eriti veel vastsündinud erinevad oluliselt täiskasvanutest organismi koostise (rasvade ja veesisaldus) ning ravimeid metaboliseerivate ensüümide aktiivsuse poolest, mis mõjutab nii aktiivsete toimeainete kui ka ravimites olevate abiainete farmakokineetilist profiili (Bartelink *et al.* 2006). Seetõttu ei ole enamasti ka võimalik täiskasvanutel tehtud uuringutest tuletada, kuidas ravim laste organismis imendub, jaotub, metaboliseerub või eritub.

Kliiniliste uuringute puudumisel pärinevad andmed ravimi annuste kohta lastel sageli arstide kliinilisest kogemusest või üksikutest ravijuhtudest (Ceci *et al.* 2006). Seetõttu on ravimite annustamise soovitused erinevates ravimiinfo allikates väga erinevad. Lastele ravimite annustamise informatsiooni erinevusi pole seni süstemaatiliselt uuritud.

Ravimvormide koostises kasutatakse tuhandeid erinevaid abiaineid, mis moodustavad keskmiselt 90% ravimvormi massist (Haywood & Glass 2011). Ideaalis peaks abiaine olema farmakoloogiliselt inaktiivne, mitte-toksiline ja mitte omama koostoimeid toimeainete või teiste abiainetega. Paraku on selliseid abiaineid tegelikkuses vähe, ning abiainete ohutus on viimasel ajal lastearstide ja eelkõige neonatoloogide jaoks järjest teravamalt tähtsustatud (Hall et al. 2004). Abiainetega seonduv on võrreldes toimeaineid puudutavate seadustega olnud vähem reguleeritud ning lastel nende ohutust reeglina kliiniliselt hinnatud ei ole. Siiski on täiskasvanutele ohutud abiained põhjustanud lastele manustamisel säilitusainena traagilisi tagajärgi. Näiteks kasutatavat bensüülalkoholi on seostatud enneaegsetel vastsündinutel tekkinud intravaskulaarse hemorraagia ja surmajuhtumitega (Hiller et al. 1986).

Hetkeseisuga on abiainete tegelik toksilisus vastsündinutele siiski täpselt teadmata. Ka ei olnud seni täpselt teada, kui paljude erinevate abiainetega vast-

sündinud ravi käigus kokku puutuvad või kui suur osa vastsündinutel kasutatud ravimitest sisaldab neile potentsiaalselt toksilisi abiaineid.

#### Uurimistöö eesmärgid

Uurimistöö peamisteks eesmärkideks oli kirjeldada ja analüüsida laste farmakoteraapiat, hinnata OL/UL ravimite kasutuse määra ning seda, millisel määral puutuvad vastsündinud haiglaravi jooksul kokku ravimites olevate abinetega ning kui suur osa nendest abiainetest võivad olla neile toksilised.

Konkreetsed eesmärgid:

- 1. Kirjeldada Eesti laste ambulatoorset ravimikasutust ning vastsündinute ravi haiglas;
- 2. Võrrelda ambulatoorset antibiootikumide määramist Eesti ja Rootsi lastele;
- 3. Hinnata lastele määratud ravimite ravimiomaduste kokkuvõtetes olevat infot selle kohta, kas ravim on lastel kasutamiseks näidustatud;
- 4. Tuvastada laste ja vastsündinute farmakoteraapias need kitsaskohad, kus ravimeid kasutatakse kõige rohkem, kuid samas ametlik pediaatriline info kõige sagedamini puudub;
- 5. Võrrelda lapsi ja vastsündinuid puudutava info olemasolu ravimiomaduste kokkuvõttes ja teistes sageli kasutatavates ravimiinfo allikates nagu Briti Rahvuslik Formular (ingl. *British National Formulary*, BNF) ja Thomson Micromedex andmebaasis;
- 6. Luua Eesti vastsündinutele haiglaravi jooksul ravimite koostises manustatud abiainete põhjal klassifikatsioon lähtuvalt abiainete võimalikust toksilisusest;
- 7. Kirjeldada potentsiaalselt toksiliste abiainete esinemist vastsündinutel kasutatud ravimites;
- 8. Kirjeldada hospitaliseeritud vastsündinute kokkupuudet neile potentsiaalselt toksiliste abiainetega.

#### Patsiendid ja metoodika

Käesolev uurimus sisaldab kahte andmebaasidele põhinevat ja ühte prospektiivset vaatlusuuringut ning viimase põhjal tehtud *Post-hoc* analüüsi.

Eesti lastele ambulatoorselt määratud retseptiravimite kasutuse ja OL/UL ravimikasutuse määra uuring põhineb ajavahemikul 1.01.2007–31.12.2007 kuni 19a isikutele välja kirjutatud retseptidel Eesti Haigekassa Retseptiravimite andmebaasist.

Vastsündinute ravimikasutuse ja OL/UL ravimikasutuse määra uurimiseks dokumenteerisime prospektiivselt ajavahemikel 01.02–01.08.2008 Tartu Ülikooli Kliinikumi ja 01.02–01.08.2009 Tallinna Lastehaigla neonatoloogia osakonda hospitaliseeritud kuni 29 päevaste vastsündinute ravimikasutuse.

Vastsündinute ravimikasutuse uuringu andmete põhjal hindasime ka vastsündinute kokkupuudet neile potentsiaalselt toksiliste abiainetega. Selleks tuvastasime ravimiomaduste kokkuvõttest või pakendi infolehelt ravimite koostises olevad abiained ning jaotasime nad kirjandusallikate alusel võimaliku toksilisuse alusel meie enda loodud klassifikatsiooni järgi rühmadesse.

Eesti ja Rootsi laste antibiootikumikasutust võrdlev uuring põhines ajavahemikul 1.01.2007 – 31.12.2007 mõlema riigi lastele ambulatoorselt välja kirjutatud retseptide analüüsil, mis pärinesid Eesti Haigekassa Retseptiravimite andmebaasist ja Rootsi Retseptiravimite andmebaasist.

#### Peamised tulemused

#### Ambulatoorne retseptiravimite kasutus

Eesti lastele kirjutati välja 2007. aastal 467 334 retsepti 851 ravimpreparaadile ja 309 toimeainele. Keskmiselt määrati 1,7 retsepti lapse kohta. Alla kuue aastastele lastele määrati kaks korda rohkem retseptiravimeid (2,5 retsepti lapse kohta) kui ülejäänud vanuserühmadele. Kõige sagedamini määrati süsteemseid antibakteriaalseid ravimeid, hingamisteedesse toimivaid ning dermatoloogilisi ravimeid. Kolmveerand retseptidest (77%) kuulus neisse kolme ravimirühma. Kolmandik (31%) retseptidest oli OL, neist enamuse (29%) puhul polnud lapsi ravimiomaduste kokkuvõttes mainitud ning 2% retseptidest (106 erinevat toimeainet) olid vastunäidustatud. 42% vastunäidustatud ravimitest ei olnud lastele sobivad suure kõrvaltoimete riski tõttu. Kõige suurem OL ravimite osakaal oli urogenitaalsüsteemi ravimite hulgas (97%), järgnesid dermatoloogilised (74%) ja kardiovaskulaarsüsteemi ravimid (61%).

Ambulatoorne UL ravimite kasutus oli harv, vaid 0.05% retseptidest 6 ravimile.

Kasutatud ravimite kohta erines pediaatriline info erinevates allikates kõige suuremal määral kesknärvisüsteemi ravimite ja antibiootikumide osas.

#### Eesti ja Rootsi laste ambulatoorne antibiootikumikasutus

Eesti lastele kirjutati 2007. aastal ambulatoorselt välja poole rohkem antibiootikumi retsepte kui Rootsi lastele, vastavalt 616 vs. 353 retsepti 1000 lapse kohta. Eestis määrati 22 ja Rootsis 50 erinevat antibiootikumi, kuid 90% retseptidest olid mõlemas riigis välja kirjutatud kaheksale toimeainele. Kõige sagedamini manustatud antibiootikumide grupp oli penitsilliinid (74% kõigist retseptidest Rootsis ja 49% Eestis). Eestis määrati sagedamini laia toimespektriga penitsilliine nagu amoksitsilliini ja selle kombinatsiooni beta-laktamaasi inhibiitoriga, samas Rootsis olid pooled retseptid kitsa toimespektriga fenoksümetüülpenitsilliinile.

### Vastsündinute ravimikasutus haiglas

Kõigist 490st uuringuperioodil hospitaliseeritud vastsündinust said ravimeid 71%. Neile määrati 1981 korral 115 erinevat ravimit. Keskmiselt sai iga vastsündinu 4 erinevat ravimit. Kõige sagedamini kasutati antibakteriaalseid, kardiovaskulaarsüsteemi ja kesknärvisüsteemi ravimeid. Kõik ravitud vastsündinud said vähemalt ühte ravimit, millel puudub müügiluba või ametlik näidustus vastsündinutel kasutamiseks. Mitte ühelgi kasutatud meeleelundite, skeletilihassüsteemi, seedekulgla ja ainevahetuse, urogenitaalsüsteemi haiguste ravimil ja suguhormoonil polnud SPCs infot vastsündinutel kasutamiseks.

Vastsündinute ravimiseks vajalik info erines infoallikates oluliselt. Kõige suurem erinevus esines ajalisi vastsündinuid puudutavas informatsioonis – määratud ravimitest 67%-l oli info olemas BNFCs, 38% Micromedexi andmebaasis ja vaid 24% Eesti SPCs.

## Vastsündinute kokkupuude ravimites olevate potentsiaalselt toksiliste abiainetega

Enamus kasutatud ravimitest (87%; 93/107) sisaldas vähemalt ühte abiainet. Kokku said vastsündinud ravimitega 123 erinevat abiainet. Kolmandik (42/123) abiainetest klassifitseeriti potentsiaalselt ohututeks, teine kolmandik (47/123) potentsiaalselt vastsündinutele toksiliseks. Viimati mainitud kategooria sisaldas ka kaheksat juba teadaolevalt vastsündinutele toksilist abiainet – parabeene, sahhariin naatriumi, naatriumbensoaati, bensüülalkoholi, bensalkooniumkloriidi, propüleenglükooli, polüsorbaat 80 ja etanooli. Ülejäänud 34 abiaine kohta ei leidunud kasutatud kirjandusallikates ohutusalast infot või ei olnud abiaine kirjeldus ravimiomaduste kokkuvõttes piisav kirjanduseotsingu tegemiseks.

Ravitud vastsündinutest 97% (339/348) said ravimite koostises vähemalt ühe potentsiaalselt toksilise abiaine ja 88% said vähemalt ühe teadaolevalt toksilise abiaine. Kasutatud ravimitest 68% sisaldasid vähemalt ühte potentsiaalselt toksilist ning 31% teadaolevalt toksilist abiainet.

## Järeldused

- I Eesti lastele ja vastsündinutele määratakse ambulatoorselt ja ka haiglas suurel hulgal OL ravimeid. Et laste farmakoteraapiat ratsionaalsemaks muuta, on vaja diagnoosidega lingitud farmakoepidemioloogilisi uuringuid sagedamini lastele määratud ravimirühmades.
- II Eesti ja Rootsi laste ambulatoorne ravimikasutus erineb olulisel määral nii kvantitatiivselt kui kvalitatiivselt. Eesti lastele määratakse antibiootikume sagedamini ning kasutatakse ka laiema toimespektriga ravimeid kui Rootsi lastele. See viitab Rootsis toimivale riiklikule strateegiale sarnase tegevuse vajalikkusele Eestis, et ennetada antibiootikumide väärkasutust. Ravimikasutuse auditid peaksid keskenduma antibiootikumide ratsionaalsele kasutusele ning tõenduspõhiste ravijuhiste järgimisele.
- III OL/UL ravimikasutuse osakaal on Eestis sarnaselt Lääne-Euroopas tehtud uuringutega kõrge. Võrreldes süsteemselt manustatud ravimitega, on nahale manustatavate ravimid sagedamini OL. OL retseptide osakaal on suurem ka alla 2 a lastel võrreldes vanemate lastega. Seetõttu tuleks nooremaid lapsi ning nahale manustatavaid ravimeid esile tõsta lastel enim uurimist vajavate ravimite nimekirjas.
- IV UL retseptide osakaal oli ambulatoorsetest retseptidest väike. Seevastu hospitaliseeritud vastsündinutele määratud ravimitest 25% ja määramiskordadest 22% olid UL. See näitab vastsündinute ravimiseks vajalike

- ravimite kohaliku ja ka Euroopa tsentraalse müügiloa puudumist ning vajadust ametliku sekkumise järele.
- V Ravim klassifitseeriti OL ravimiks kõige sagedamini seetõttu, et ravimiomaduste kokkuvõttes puudus info kasutamise kohta lapsel või vastsündinul. Spetsiifilistest ravimiinfo käsiraamatutes nagu Briti Rahvuslik Formular Lastele või andmebaasides nagu Micromedex on oluliselt rohkem pediaatrilist infot kui ametlikus ravimiomaduste kokkuvõttes. Kuna paljude OL ravimite kohta on olemas piisavalt kliinilist informatsiooni lastel kasutamise kohta, oleks vajalik vaid nende ravimite ravimiomaduste kokkuvõtete värskendamine. Kui ravimit ei soovitata lastel kasutada, siis tuleb selle põhjus ravimiomaduste kokkuvõttes välja tuua, et teavitada ravimi tarvitajaid ja määrajaid võimalikest ravimi kasutamisega seotud ohtudest lastel või ebaefektiivsest toimest.
- VI Kolmandik hospitaliseeritud vastsündinutele ravimitega manustatud abiainetest klassifitseeriti vastsündinutele potentsiaalselt ohtlikeks, kuid neist vaid kaheksat on varem vastsündinutele ohtlikuks liigitatud. Hetkel on vajadus valideeritud klassifikatsiooni järele, mille alusel saaks abiaineid ohtlikkuse järgi jaotada.
- VII Praktiliselt kõik ravimeid saanud vastsündinud said uuringuperioodil ravimeid, mis sisaldasid vähemalt ühte neile potentsiaalselt ohtlikku abiainet. Kuna avaldatud informatsioon abiainete kohta on vähene, on äärmiselt oluline ravimites olevate abiainete põhjalik toksikoloogiline hindamine lähtuvalt nende potentsiaalsest toksilisusest vastsündinutele. Abiainetest tulenevad potentsiaalsed ohud vastsündinutele ning ka abiainete kvantitatiivsed kogused ravimis tuleb teha apteekritele ja vastsündinuid ravivatele arstidele kättesaadavaks, et oleks võimalik valida vastsündinule sobivaimaid ja ohutumaid ravimeid.

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