



May 21, 2019

Re: FDA-2019-N-1317

Dear Members of the Food and Drug Administration Antimicrobial Drugs Advisory Committee,

The Global Tuberculosis Community Advisory Board (TB CAB) is a group of research-literate, community-based activists from HIV and tuberculosis (TB) networks across the world. Founded in 2011, the TB CAB is dedicated to increasing meaningful community engagement in TB research and to mobilizing political will to advance the development and uptake of new tools to fight TB. We act in an advisory capacity to product developers and institutions conducting clinical trials of new TB drugs, drug regimens, diagnostics, and vaccines.

We are writing in regards to the new drug application (NDA) for pretomanid, a drug candidate developed by the TB Alliance. As a stakeholder in the tuberculosis (TB) community, TB CAB wishes to share its views on regulatory and research considerations related to pretomanid. We hope the considerations outlined in this document will inform the discussions and decisions of the U.S. Food and Drug Administration (FDA) and the Antimicrobial Drugs Advisory Committee.

Preliminary results from a small, uncontrolled study of a combination of new drug candidate pretomanid with existing drugs bedaquiline and linezolid indicate that people with especially difficult to treat forms of drug-resistant tuberculosis (DR-TB) may be able to achieve cure with just six months of treatment.¹ This represents both a reduction in the number of drugs, and the length of treatment, from the current World Health Organization (WHO)-recommended 18-20 month, four-drug regimens that combine bedaquiline and linezolid with other older and repurposed TB medicines.

According to a modified intention-to-treat analysis of interim results presented at the 2018 Union World Conference on Lung Health, 88 percent (66/75) of participants treated with six-months of bedaquiline, pretomanid, and linezolid had a favorable outcome (sputum cultures negative for TB after six months of treatment and six months of post-treatment follow-up).² These findings and the FDA acceptance of the TB Alliance's application to register pretomanid for extensively drug-resistant TB (XDR-TB), treatment intolerant multidrug-resistant TB (MDR-TB), and treatment non-responsive MDR-TB,³ have important implications for the field and for the future of TB drug and regimen development.

As civil society, including representatives and members of TB-affected communities, we understand well the need for better and shorter treatment options, especially for difficult-to-treat forms of TB, and the importance of expediting access to the benefits of research into new TB medicines and regimens. As science-based treatment activists, we want to

ensure that well-intentioned efforts to expeditiously serve the needs of TB patients today do not inadvertently do a disservice to the TB patients of the future.

Below, we share our concerns that the approval of the New Drug Application (NDA) for pretomanid may set a precedent with the potential to lower the evidentiary standard for the future approval of new TB drugs and regimens. We strongly believe that well-designed randomized controlled trials (RCTs) must remain the regulatory gold standard for sponsors seeking approval for new TB drugs and regimens in the future. We also discuss remaining research gaps of critical importance to patient care and normative guidance.

Regulatory Considerations

The TB Alliance’s NDA for pretomanid is precedent-setting in several ways. Pretomanid represents only the fourth new TB drug to go through stringent regulatory authority (SRA) review in the past half a century, and the first developed by a not-for-profit organization. It is the first regulatory filing for a TB medicine in the context of a regimen. Additionally, the primary basis for the TB Alliance’s regulatory filing is a small uncontrolled, non-randomized study designed in one era of DR-TB care (the pre-bedaquiline era) and completed in another (the post-bedaquiline era). Evolutions in the standard of care available to people with DR-TB since the Nix-TB trial opened to enrollment, merit nuanced and open discussion. The FDA and members of the Antimicrobial Drugs Advisory Committee will need to weigh the need for new treatment options against concerns about maintaining regulatory stringency for TB drugs and regimens.

Given challenges recruiting people with XDR-TB for trials, and the length, toxicity, lack of clinical trial evidence, and poor performance of the standard of care for the treatment of pre-XDR and XDR-TB at the time the Nix-TB trial opened,⁴ the single arm, open label design of the Nix-TB trial may have been considered acceptable. At the time, novel drugs bedaquiline and delamanid were not widely available, had not yet been shown to be able to be taken together safely, and five-year mortality rates with World Health Organization (WHO)-recommended regimens for XDR-TB were as high as 73 percent.⁵

A seminal article published in the *New England Journal of Medicine (NEJM)* in 1990 by Byar et al., *Design Considerations for AIDS Trials*—credited in part for reshaping the design and conduct of critical path regulatory trials of new treatments for HIV/AIDS—outlines the requirements under which an uncontrolled phase III trial to evaluate the efficacy of a new drug may be justified:

1. “There must be no other treatment appropriate to use as a control;
2. There must be sufficient experience to ensure that the patients not receiving therapy will have a uniformly poor prognosis;
3. The therapy must not be expected to have substantial side effects that would compromise the potential benefit to the patient;
4. There must be a justifiable expectation that the potential benefit to the patient will be sufficiently large to make interpretation of the results of a nonrandomized trial unambiguous; and

5. The scientific rationale for the treatment must be sufficiently strong that a positive result would be widely accepted.”⁶

In the case of pretomanid and the Nix-TB regimen, one could argue that these requirements were largely met at the time the study was designed. Over the course of the Nix-TB study, however, the standard of care and outcomes for drug-resistant forms of TB changed dramatically.⁷ As a result of these changes, the Nix-TB study no longer meets at least four of the five requirements (requirements 1, 2, 4, and 5) outlined by Byar et al.

Table 1. Applying Byar et al. requirements to Nix-TB

<p>Requirement 1: there must be no other treatment appropriate to use as a control</p>	<p>An appropriate control regimen for XDR-TB could be composed according to WHO treatment guidelines (using a number of new and repurposed medicines, including bedaquiline, linezolid, clofazimine, and delamanid (which shares the nitroimidazole class with pretomanid)).</p>
<p>Requirement 2: there must be sufficient experience to ensure that the patients not receiving therapy will have a uniformly poor prognosis</p>	<p>Since the Nix-TB trial opened to enrolment in 2015, the prognosis for people diagnosed with DR-TB has greatly improved with increased access to new and repurposed TB medicines, including bedaquiline. A retrospective cohort analysis of patients with rifampicin-resistant TB (RR-TB) treated with bedaquiline in South Africa showed bedaquiline’s inclusion in a treatment regimen was associated with a 41 percent increase in treatment success and a three-fold reduction in mortality compared with regimens that did not contain bedaquiline.⁸</p>
<p>Requirement 4: there must be a justifiable expectation that the potential benefit to the patient will be sufficiently large to make interpretation of the results of a nonrandomized trial unambiguous</p>	<p>While there are potential benefits to patients from receiving the Nix-TB regimen (including its short duration), the relative contribution of pretomanid to the regimen remains ambiguous. It is possible that the positive treatment outcomes observed in the Nix-TB study are driven by bedaquiline and linezolid, and that patients treated with regimens that contain these two drugs would do well regardless of whether they received pretomanid. This uncertainty creates ambiguity in how the results from Nix-TB should be interpreted.</p>

<p>Requirement 5: the scientific rationale for the treatment must be sufficiently strong that a positive result would be widely accepted</p>	<p>Clear evidence of pretomanid’s independent contribution in humans with TB disease to the Nix-TB regimen is limited to two phase II, 14 day, early bactericidal activity (EBA) studies (see Table 2). The endpoint evaluated in EBA studies, colony-forming units, is not a reliable surrogate marker for efficacy. The limited additional clinical data supporting pretomanid’s contribution to the Nix-TB regimen challenge wide acceptance and agreement regarding how the study results should be interpreted and translated into policy and practice.</p>
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Interim results from the Nix-TB study have been presented at international conferences and in other forums, but peer-reviewed analyses had not been made available at the time of writing. In its public communications, the TB Alliance compares successful treatment outcomes among the XDR-TB patients enrolled in Nix-TB (88 percent) to those observed among XDR-TB patients treated under program conditions in South Africa from 2008–2012, establishing a historic control (16 percent treatment success).⁹ This historic control is now out of date. According to WHO cohort data from 2015, estimated treatment success rates among people with XDR-TB were 34 percent.¹⁰ More recent data, including from cohorts in South Africa and Belarus, indicate treatment success rates for patients with XDR-TB with reported final outcomes range from 65-93 percent with the implementation of existing bedaquiline-based regimens.^{11,12}

Byar et al. warned that non-randomized, historic control participants may differ from patients receiving the new treatment in several ways, including that patients may not receive the same care and support. This could be the case with the Nix-TB study; in fact, other recent phase III MDR-TB trials have already demonstrated this risk: the control arms in both phase I of the STREAM study and Otsuka 213 performed surprisingly well compared to outcomes observed in program settings. In each study, roughly 80 percent of participants randomized to the control regimen had a favorable treatment outcome.^{13,14} In contrast, data from patients treated under program conditions indicate just 55–70 percent of patients treated for MDR-TB have a successful treatment outcome.¹⁵ If STREAM and Otsuka 213 were conducted as single arm studies and compared to historic controls (like Nix-TB), the effect of each intervention compared to the existing standard of care for MDR-TB would be dramatically overstated relative to the actual differences observed between the experimental and control arms in these trials.

It is unknown whether a similar effect would have been observed in the context of a RCT comparing the pretomanid-containing Nix-TB regimen to the pre-bedaquiline standard of care for XDR-TB and treatment intolerant or non-responsive MDR-TB. Any comparisons made between the outcomes observed in the Nix-TB study and those observed under program conditions in the pre-bedaquiline era should be interpreted with the above risks

in mind. The meaningful comparison regulators should consider today is how the Nix-TB regimen compares to other regimens that contain bedaquiline and linezolid as these make up the current standard of care for DR-TB.

Given the above-described considerations resulting from changes to the standard of care and outcomes for drug-resistant forms of TB, the non-randomized, uncontrolled approach to evaluating pretomanid and the Nix-TB regimen is not an acceptable trial design upon which full approval should be granted.

Granting full marketing approval to pretomanid based on the amount and quality of data behind the Nix-TB regimen has the potential to seriously lower regulatory standards and absolve product sponsors of their responsibility to adequately demonstrate proof of safety and efficacy before receiving authorization to market new TB drugs and regimens. The TB CAB feels strongly that large, randomized controlled trials (RCTs) must remain the regulatory gold standard for sponsors seeking approval for new TB drugs and regimens.

Research Considerations

Bedaquiline and delamanid were developed independent of each other and as add-ons to an 18-24 month regimen of toxic medicines. This approach left the field with two new drugs and no evidence to inform how they might be used together or to shorten and/or optimize treatment by replacing older toxic medicines. The development of pretomanid as part of a novel regimen is a welcome advance, but the relatively limited experience with pretomanid and the design of the Nix-TB study, leave pretomanid’s safety and efficacy unconfirmed. In addition, there are a number of research gaps concerning questions of critical importance to patient care and normative guidance that remain unfilled.

Pretomanid has been administered in clinical trial settings to more than 1,200 people in 14 countries.¹⁶ However, far fewer people have received pretomanid for the indication and duration of the Nix-TB regimen (see Table 2).

Table 2. Phase II and III studies of pretomanid

Study Identifier	Phase	Treatment duration	Population	Actual enrollment (Total)	Intervention(s)	Comparator	Status
PA-824-CL-007 NCT00567840	II	14 days	DS-TB	69	Pa	HRZE	Complete
CL-010 NCT00944021	II	14 days	DS-TB	69	Pa	HRZE	Complete
NC-001 NCT01215851	II	14 days	DS-TB	85	PaB PaZ PaMZ	HRZE	Complete
NC-002 NCT01498419	II	8 weeks	DS-TB MDR-TB	207	PaMZ	HRZE	Complete
NC-003 NCT01691534	II	14 days	DS-TB	105	BPaZC BPaZ BPaC BZC Z C	HRZE	Complete
NC-005 NCT02193776	II	8 weeks	DS-TB MDR-TB	240	BPaMZ	HRZE	Complete

APT trial NCT02256696	II	12 weeks	DS-TB	183	HRZPa/HRPa HRbZPa/HRbPa	HRZE	Recruiting
STAND/ NC-006 NCT02342886	III	4-6 months	DS-TB	284	PaMZ	HRZE	Discontinued
Nix-TB NCT02333799	III	6-9 months	Pre-XDR-TB XDR-TB MDR-TB	109	BPaL	None	Active, not recruiting
ZeNix/ NC-007 NCT03086486	III	6-9 months	Pre-XDR-TB XDR-TB MDR-TB	180	BPaL	None	Recruiting
SimpliciTB/ NC-008 NCT03338621	III	4-6 months	DS-TB MDR-TB	450	BPaMZ	HRZE	Recruiting
TB-PRACTECAL NCT02589782	II/III	6 months	MDR-TB	630	BPaLM BPaLC BPaL	Local MDR-TB SOC	Recruiting
B = bedaquiline; C = clofazimine; E = ethambutol; H = isoniazid; L = linezolid; M = moxifloxacin; Pa = pretomanid; R = rifampicin; Rb = rifabutin; Z = pyrazinamide DS-TB = drug-sensitive tuberculosis; MDR-TB = multidrug-resistant tuberculosis; XDR-TB = extensively drug-resistant tuberculosis							

The results of studies including pretomanid have not always been favorable or transparently and comprehensively reported. In 2015, following the deaths of three participants in the TB Alliance’s STAND trial (PaMZ) associated with hepatotoxicity, recruitment was suspended, and then followed by a partial clinical hold by the FDA. The hold was eventually removed, but the TB Alliance never reinitiated recruitment to the study. In 2016, the TB Alliance permanently discontinued recruitment, at which point it had enrolled just 284 of a planned 1,200 participants with DS-TB and 300 participants with MDR-TB. Upon this decision, the TB Alliance stated its plans to instead re-focus its resources to launch a phase III study (SimpliciTB) to test the STAND regimen (PaMZ) plus bedaquiline, which “appears to be much more promising compared to the PaMZ regimen” alone.¹⁷

Several aspects of this story concern us. There was no public communication regarding the cause(s) of the three deaths in the STAND trial, and pretomanid’s potential contributions to these hepatotoxic events. The only public record that these deaths occurred is the “study results” tab of the ClinicalTrials.gov page for the STAND trial (NCT02342886). Under “limitations and caveats” it says, “following three deaths associated with hepatotoxicity, recruitment was suspended, followed by a partial clinical hold by the FDA. The hold was removed but the Sponsor permanently stopped recruitment in December 2016.”¹⁸ To date, the TB Alliance has not published any findings, or its Drug Safety Monitoring Board’s (DSMB) review of the deaths that occurred in the STAND trial. Both the FDA and the South African Health Products Regulatory Authority (SAHPRA) reviewed the deaths that occurred in the STAND trial, but neither agency published anything in the public domain. The STAND trial deaths and study discontinuation, and the lack of transparency around these events, have left us concerned about pretomanid’s safety, especially for people living with HIV, given that a majority of antiretroviral medications also are processed through, and have an effect on, the liver.

In addition to the need for more data to support the safety of pretomanid, further work is necessary to define the background regimen and improve its tolerability. Linezolid, a key component of the Nix-TB regimen has several difficult side effects, including

myelosuppression and peripheral neuropathy. In February 2017, at the Conference on Retroviruses and Opportunistic Infections (CROI), the TB Alliance reported 71 percent of patients had at least one linezolid dose interruption (22 percent of all participants due to myelosuppression and 28 percent due to peripheral neuropathy).¹⁹ This finding underscores the importance of additional research to further improve the safety and tolerability of the Nix-TB regimen, particularly to reduce linezolid toxicity. The TB Alliance is evaluating linezolid dosing and duration in the ZeNix study, also referred to as NC-007, but final results are only expected in 2022.²⁰ As pretomanid undergoes SRA review in the context of the Nix-TB regimen, and the TB Alliance and Mylan plan for its market introduction, the optimal dose and duration of linezolid, a critical component of the regimen, remains unknown.

Another critical knowledge gap is how pretomanid compares to delamanid, a drug from the same class as pretomanid. Delamanid has completed a phase III trial, is SRA-approved and WHO-recommended, and is being rolled out for the treatment of MDR-TB. The possibility that replacing pretomanid with delamanid could produce a regimen similar or superior in efficacy or safety (or both) to the Nix-TB regimen begets the need for additional research.

In summary, continued investigations of pretomanid and the Nix-TB regimen are urgently required to: (1) confirm pretomanid's safety and efficacy; (2) optimize the dose and duration of linezolid; (3) compare pretomanid and delamanid; and. If full SRA-approval is granted, it will be very difficult to hold the sponsors accountable for conducting studies to fill the first three of these critical knowledge gaps.

We hope the FDA and members of the Antimicrobial Drugs Advisory Committee will take the research and regulatory considerations raised in this document into account in their discussions and decisions related to the NDA for pretomanid.

Sincerely,

Patrick Agbassi and Carolina Morán Jara
Co-Chairs, Global TB Community Advisory Board
On behalf of the Global TB Community Advisory Board

References

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