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**COMMITTEE FOR MEDICINAL PRODUCTS FOR HUMAN USE  
(CHMP)**

**DRAFT**

**GUIDELINE ON THE DEVELOPMENT OF MEDICINAL PRODUCTS FOR THE  
TREATMENT OF ALCOHOL DEPENDENCE**

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*Alcohol Dependence, Guidance*

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## 1 EXECUTIVE SUMMARY

2 Alcohol dependence is in general accepted as a psychiatric disorder with harmful physical, mental and  
3 social consequences and a high probability of a chronic relapsing course. It is considered a major  
4 public health problem in most Western societies. The aim of this guideline is to provide guidance on  
5 clinical studies for drugs developed for the treatment of alcohol dependence.

6 The present document should be conceived as general guidance, and should be read in conjunction  
7 with other applicable EU and ICH guidelines (see Section 3).

## 8 1. INTRODUCTION

### 9 1.1 Epidemiology and classification of alcohol dependence

10 Alcohol use disorders develop against a genetic, psychosocial and environmental background. Life-  
11 time prevalence estimates for all alcohol use disorders in the general population in Europe range from  
12 12 to 24%. Alcohol related health disabilities include liver diseases, cardiovascular diseases such as  
13 alcoholic cardiomyopathy, various forms of cancer, gastrointestinal haemorrhage, pancreatitis, as well  
14 as severe neurological, cognitive and psychiatric complications. Some complications such as  
15 Korsakow syndrome are rather related to malnutrition and deprived vitamin B uptake secondary to  
16 alcohol use.

17 Alcohol use disorders can be categorized like other substance use disorders according to WHO/ICD-  
18 10 (among others) into harmful use and dependence or according to DSM IV-TR into abuse and  
19 dependence. Whereas there is good diagnostic concordance for dependence in both classification  
20 systems, there is markedly less agreement for harmful use and abuse respectively. Regarding  
21 dependence, both classification systems additionally assess present state, course of disease and  
22 association with physical symptoms.

23 The prevalence of alcohol dependence was estimated at 5-6% in men and 1-2% in women in Europe;  
24 however, the number of alcohol dependent women has been increasing recently. The average time of  
25 progression from initial problem drinking to alcohol dependence has been reported to be in the 6 to 8  
26 year range.

27 In general, alcohol dependent patients are a very heterogeneous population with respect to genetic  
28 factors, personality disorders, co-morbidities, severity, cognitive impairment, age of onset, gender,  
29 motivation concerning readiness to change, social support for drinking or abstinence, craving and  
30 others. Especially psychiatric co-morbidity like depression is common in people with alcohol  
31 problems and is an essential factor influencing the course of disease and treatment. Furthermore  
32 alcohol dependence is more common in elderly males than in women and young adult males.

33 It is estimated that 10% of people with alcohol problems have a severe mental illness, 50 % have a  
34 personality disorder and up to 80% have a milder mood disorder. On the other hand, there is good  
35 evidence that those milder forms of anxiety and depression often resolve with abstinence in patients  
36 with alcohol dependence.

37 In order to address all these differences, several subtype classifications of alcohol-dependent patients  
38 were developed, but none of them is currently in widespread use or generally accepted. Rather, a  
39 paradigm shift happened in the last years from a categorical towards a multidimensional diagnostic  
40 approach regarding alcohol use disorders, which will be very probably implemented in the  
41 forthcoming DSM V and ICD 11.

42 The risk for relapse after initiated abstinence also may depend on multiple variables, such as general  
43 personal characteristics (like demographic background, personality factors, degree of dependence,  
44 family history), degree of stress and perceived self-efficacy and level of confidence respectively with  
45 regard to cue-situations.

### 46 1.2 Definition of dependence and (re-)lapse

47 According to the definitions of the World Health Organisation ICD-10, and DSM-IV-TR, alcohol  
48 dependence is characterised by a cluster of physiological, behavioural and cognitive phenomena, in  
49 which the use of this substance takes on a much higher priority for an individual than other behaviours

50 that once had greater value, and a return to drinking after a period of abstinence is often associated  
51 with a reappearance of the features of the syndrome (priming). Criteria for diagnosis of alcohol  
52 dependence include a strong desire or compulsion to drink alcohol despite knowledge or evidence of  
53 its harmful consequences, difficulty in controlling drinking in terms of onset, termination or level of  
54 its use, physiological withdrawal symptoms and development of tolerance.

55 Moderate dependence is characterized by raised level of tolerance (needing to drink more to reach the  
56 same level of intoxication), some symptoms of withdrawal and impaired control over drinking.  
57 Severely dependent patients additionally show relief drinking, morning drinking, stereotypical  
58 drinking, as well as blackouts.

59 According to the WHO Lexicon of Alcohol and Drug Terms relapse is defined as a return to drinking  
60 after a period of abstinence, usually accompanied by reinstatement of dependence symptoms. Some  
61 experts in the field additionally distinguish between relapse and lapse (or slip), with the latter  
62 describing an isolated occasion of alcohol use.

### 63 **1.3 Risk levels of drinking**

64 The relationship between extent of drinking and the risk for the development of alcohol dependence is  
65 consistently strong (although not simple), i.e. the main risk factor for alcohol dependence is chronic  
66 excessive drinking. If alcohol dependence is once established it influences itself pattern and extent of  
67 consumption. Furthermore there is a strong correlation between extent of alcohol consumption and  
68 subsequent harm.

69 According to the WHO “International guide for monitoring alcohol consumption and related harm”,  
70 alcohol consumption is categorized in different health risk levels.

71 WHO-Criteria for risk of consumption on a single drinking day

	Males	Females
73 Low Risk	1 to 40g,	1 to 20g
74 Medium Risk	41 to 60g,	21 to 40g
75 High Risk	61 to 100g	41 to 60g
76 Very High Risk	101+g	61+g

77 The most desirable level of consumption (apart from abstinence) concerning health outcome both at  
78 short and long-term use is the low risk level (1 to 40g pure alcohol on a single drinking day for men  
79 and 1 to 20g for women). Of note for really everyday consumption, WHO recommends currently a  
80 limit of 7g pure alcohol and even this is considered too much for some special groups, e.g. pregnant  
81 women or patients with liver cirrhosis.

### 82 **1.4 Development and maintenance of dependence**

83 Chronic drinking leads to durable neuroadaptive changes in the brain, which are believed to form the  
84 core of alcohol dependence. It is assumed that in alcohol dependent individuals the discomfort and  
85 distress that result from these persistent changes in brain reward and stress circuits underlie the  
86 compelling motivation to drink.

87 Current research suggests several pathways which are involved in the development and the  
88 maintenance of alcohol dependence. One pathway involves the opioidergic and the mesolimbic  
89 dopaminergic system, which seems to cause alcohol craving and relapse due to positive reinforcing  
90 effects of alcohol consumption, especially in earlier stages of the disease. A second pathway involves  
91 several components of the glutamatergic and the GABAergic system, which seems to induce alcohol  
92 craving and relapse due to a hyperglutamatergic state. A further pathway seems to be a  
93 hypodopaminergic state, especially during alcohol withdrawal after chronic alcohol intake, which is  
94 associated with a state of dysphoria that promotes resumption of alcohol intake. However, since it is  
95 recognized now that alcohol affects more or less all major neurotransmitters or neuromodulator

96 systems, directly or indirectly, future research will probably indicate further pathways or combinations  
97 of pathways concerning the development and maintenance of dependence.

98 Most patients with (former) alcohol dependence are thought to retain a continuing vulnerability to  
99 relapse for years or even lifetime due to the neuroadaptive changes. The majority of relapses after  
100 initiated abstinence occur within a period of one year, especially within the first 6 months.

## 101 **1.5 Treatment of alcohol dependence**

102 The goals of alcohol dependence treatment include the achievement of abstinence, reduction in  
103 frequency and severity of relapse, and improvement in health and psychosocial functioning.

104 Qualified treatment for alcohol dependence is delivered under a continuing care model that is  
105 appropriate for a chronic illness, and usually includes a detoxification phase followed by a relapse  
106 prevention phase. Currently, some treatment programs aim at controlled alcohol consumption as a first  
107 step in the healing process. However, due to the developed addiction memory and impaired control of  
108 drinking, clinically significant reduction of consumption may be difficult to be achieved in alcohol  
109 dependent patients, at least for severely dependent ones.

110 Withdrawal symptoms in the detoxification phase are very individually pronounced. Symptoms of  
111 alcohol withdrawal typically begin within 4-12 hours after cessation or reduction of alcohol use, peak  
112 in intensity during the second day of abstinence, and generally resolve within several days. Serious  
113 complications include seizures, hallucinations, and delirium. Patients with severe withdrawal  
114 symptoms are usually treated for 5 to 7 days in an in-patient setting with benzodiazepines to reduce  
115 central nervous system irritability, fluids and thiamine and if necessary further medications such as  
116 anticonvulsants and antipsychotic agents.

117 In the subsequent relapse prevention phase different psychosocial treatment modalities are the  
118 essential components of a comprehensive treatment program, which addresses also co-occurring  
119 psychiatric and general medical conditions. Currently only relatively few alcohol dependent patients  
120 receive an adjunctive pharmacologic relapse prevention therapy.

121 Usually alcohol dependent patients require long-term care, although the intensity and specific  
122 components of treatment may vary over time, e.g. intensified monitoring is necessary during the early  
123 stages of treatment, times of transition to less intensive levels of care, and the first year after active  
124 treatment has ceased. The course of alcohol dependence is often characterized by periods of  
125 abstinence with recurring periods of relapses. Therefore a relapse after a longer period of abstinence  
126 should not be perceived as complete failure of therapy, but should give rise to an intensified level of  
127 treatment. In general treatment compliance is a significant determinant of treatment outcome and is  
128 known to be poorest among those patients with co-morbid medical, psychiatric, family and social  
129 problems.

130 Treatment settings include in principle hospitals, residential treatment facilities, partial hospitalization  
131 programs, and outpatient programs. For several years though, relapse prevention treatment is  
132 increasingly conducted in an outpatient setting, as there is good evidence that patients should be  
133 treated in the least restrictive setting that is likely to be safe and effective.

## 134 **1.6 Established pharmacological treatment**

135 Medicines that are currently approved in many countries for relapse prevention in alcohol dependence  
136 are disulfiram, acamprosate and naltrexone. All three are only recommended as adjunctive to  
137 psychosocial counselling in motivated patients.

138 *Disulfiram* is classified as an aversive treatment modality and primarily applied as a test of motivation  
139 or compliance with therapy. It interferes with alcohol metabolism, causing accumulation of toxic  
140 acetaldehyde. If alcohol is consumed simultaneously (although it is strongly recommended to avoid  
141 this), Disulfiram causes severe headache, nausea, and with higher amount of alcohol also more  
142 dangerous toxic effects.

143 *Acamprosate*, a GABA agonist and functional glutamate antagonist, is used as an anti-craving  
144 substance in several EU countries for preventing relapses in abstinent alcohol users. It has shown

145 higher abstinence rates and longer periods of abstinence respectively, compared to placebo in several  
146 but not all trials.

147 *Naltrexone*, a non-selective opiate antagonist, binds with receptors for endogenous opioids and  
148 appears to modify some of the reinforcing effects of alcohol and to prevent the reinstatement of  
149 extinguished alcohol-seeking behaviour induced by alcohol-associated cues. Naltrexone treated  
150 alcohol-dependent patients have been reported to drink less frequently and smaller quantities.  
151 However, no benefit in continued abstinence vs placebo has been shown.

152 Although superior efficacy was shown compared to placebo, especially in the acamprosate and  
153 naltrexone trials, the number of patients responding to these treatments is usually modest.

154 Several other drugs have been tested in recent years, e.g. dopamine antagonists and (partial) agonists,  
155 various anticonvulsants, NMDA receptor antagonists and various serotonergic agents, however  
156 evidence is either limited to date or no difference to placebo could be shown.

## 157 **2. SCOPE**

158 The scope of the present document is to provide guidance in the definition of treatment goals, study  
159 design, outcome measures, and data analysis for new products that will be developed to treat alcohol  
160 dependence.

161 Alcohol abuse or harmful drinking, including binge drinking and heavy social drinking, are currently  
162 no target indications. They have a rather low stability during life-time and only quite rarely develop  
163 into alcohol dependence. Furthermore they can be treated successfully with psychosocial counselling  
164 alone. Additionally it is yet unclear which heavy social drinkers and binge drinkers will ultimately  
165 develop dependency. Prevention of dependency in this group of alcohol disorders by specific  
166 compounds is therefore no treatment option at this stage.

167 The main focus of this guideline is on products that are developed as an aid to achieve and maintain  
168 abstinence in patients with alcohol dependence. This includes products to prevent relapses after  
169 initiated abstinence, as well as products leading to clinically significantly reduced alcohol  
170 consumption as an intermediate goal on the way to full abstinence.

171 Of note, this guidance document is not intended for products that are developed for treating symptoms  
172 of acute alcohol intoxication, acute withdrawal symptoms, or to treat specific diseases, which are  
173 consequences of long term alcohol abuse. However, this does not imply that the development of such  
174 treatment options is considered as irrelevant.

## 175 **3. LEGAL BASIS**

176 This document should be read in conjunction with Directive 2001/83/EC (as amended) and all relevant  
177 CHMP Guidelines, among them:

- 178 • Dose-Response information to Support Drug Registration – CPMP/ICH/378/95 (ICH E4);
- 179 • Statistical Principles for Clinical Trials – CPMP/ICH/363/96 (ICH E9);
- 180 • Choice of Control Group in Clinical Trials – CPMP/ICH/364/96 (ICH E10);
- 181 • Adjustment for Baseline covariate CHMP/EWP/2863/99;
- 182 • Missing data – CPMP/EWP/177/99;
- 183 • Extent of Population Exposure to Assess Clinical Safety – CPMP/ICH/375/95 (ICH E1A);
- 184 • Studies in support of special populations: geriatrics – CPMP/ICH/379/99 (ICH E7);
- 185 • Clinical investigation of medicinal products in the paediatric population – CPMP/ICH/2711/99  
186 ICH 11);
- 187 • Pharmacokinetic studies in man (EudraLex vol. 3C C3A);
- 188 • Guideline on the exposure to medicinal products during pregnancy: need for post-authorisation  
189 data EMEA/CHMP/313666/2005;

- 190 • Note for guidance on the investigation of drug interactions EMEA/CPMP/EWP/560/95;
- 191 • Guideline on the Non-Clinical Investigation of the Dependence Potential of Medicinal Products-
- 192 CHMP/SWP/94227/2004.

## 193 **4. PHARMACOLOGICAL TREATMENT TRIALS IN ALCOHOL DEPENDENCE**

### 194 **4.1 Subject characteristics and selection of subjects**

#### 195 **4.1.1 Inclusion criteria**

196 Subjects with the intention to stop drinking, or to reduce drinking significantly as a first step in the  
197 case of harm reduction studies, should be screened by a validated screening tool such as the AUDIT  
198 questionnaire (Alcohol Use Disorders Identification Test) to assess the level of the alcohol problem  
199 and subsequently fulfil the criteria for alcohol dependence as defined in the DSM IV (TR) or ICD-10.

200 In the case of relapse prevention trials the patients should be abstinent and fully detoxified at baseline.  
201 It should be decided a priori whether detoxification occurs before or after randomisation. Prior to the  
202 study, criteria should be defined for successful detoxification. For a harm reduction study, there is no  
203 need for detoxification at inclusion.

204 In general inclusion of patients should be as broad as possible. However, patients included in the main  
205 trials should have a high or very high level of total alcohol consumption at baseline (see 1.3) in order  
206 to be clearly representative for moderate to severe alcohol dependent patients in the general  
207 population.

208 The number and duration of previous abstinence attempts and former pharmacotherapy for drinking  
209 cessation should be documented. If in the study a mixed population is included (i.e. patients without  
210 prior treatment and treatment resistant patients) the study should be stratified for these groups.

211 Additionally, it is recommended to stratify subjects according to their level of dependence. The level  
212 of dependence can be measured by validated instruments for that purpose, such as the SDAQ (Severity  
213 of alcohol dependence questionnaire) or the Addiction Severity Index.

#### 214 **4.1.2 Exclusion criteria**

215 Psychiatric co-morbidity (affective and anxiety disorders, psychotic disorders, post-traumatic disorder,  
216 personality disorders) is common in people with alcohol dependence. Therefore presence of co-  
217 existing psychiatric disorders needs to be assessed and quantified by a comprehensive psychiatric  
218 evaluation. The use of a validated, reliable (semi-)structured interview for establishing the diagnosis  
219 and to apply inclusion and exclusion criteria is necessary (e.g. the structured clinical interview for  
220 DSM-IV).

221 Milder forms of anxiety and depression are known to often resolve within 3 weeks after detoxification.  
222 Therefore patients with such milder symptoms may be included. However, patients with significant  
223 Axis I co-morbidity (e.g. schizophrenia, major depressive disorder or severe anxiety disorders) as well  
224 as other substance use disorders (with the exception of nicotine abuse) should be excluded in the main  
225 studies. After an effect is clearly demonstrated in the main studies, trials in patients with psychiatric  
226 co-morbidities may be conducted.

227 Also patients with other potentially confounding co-morbid disorders should be excluded if the test-  
228 drug is known to be effective in the co-morbid disorder in order to assign observed test-drug efficacy  
229 in the trial unequivocally to a specific effect on alcohol dependence. If certain potentially confounding  
230 co-morbid disorders cannot be excluded, these disorders should be carefully documented.

231 The use of other medications during the studies must be adequately documented. However, any  
232 psychotropic drugs should be excluded.

#### 233 **4.1.3 Baseline characteristics**

234 Since heterogeneity is existent in many aspects of alcohol dependent patients it is necessary to  
235 thoroughly characterize included patients at baseline.

236 **The following descriptive features should be documented:**

- 237 • demographic features (age, gender, ethnicity, social-economic factors);
- 238 • age of onset of drinking (early-onset or late-onset);
- 239 • the number of heavy drinking years;
- 240 • age of onset of dependence;
- 241 • the nature of dependence, whether episodic or chronic;
- 242 • the level of alcohol dependence severity measured by a validated instrument such as the Severity
- 243 of alcohol dependence questionnaire (SDAQ), the Addiction Severity Index (ASI) or the Alcohol
- 244 Dependence Scale (ADS);
- 245 • the extent of alcohol cue induced and stress induced craving/urge to drink (self-reported craving
- 246 rating and a validated assessment tool like the Obsessive Compulsive Drinking Scale);
- 247 • alcohol consumption assessment by instruments such as Alcohol Timeline Follow Back Calendar
- 248 Method (TLFB), including grams of pure alcohol/drinking day, the number of drinking days/week
- 249 or month, as well as the number of heavy drinking days/week or month (defined as more than 60
- 250 grams per day for men or more than 40 grams per day for women);
- 251 • motivation for change assessment such as the Stages of change questionnaire;
- 252 • treatment goal of complete abstinence (or not) as well as client motivation;
- 253 • history of previous abstinence attempts (including duration of previous abstinence) and their
- 254 treatment;
- 255 • history regarding withdrawal syndromes;
- 256 • body weight;
- 257 • general medical, neurological and psychiatric history and examination as well as consequences of
- 258 alcohol dependence on the patient's cognitive, behavioral and physiological functioning;
- 259 • general health score;
- 260 • AUDADIS (Alcohol Use Disorders and Associated Disabilities Interview Schedule);
- 261 • a family parental alcohol use disorder and social economic status;
- 262 • baseline CGI severity (Clinical Global Impression Severity Score);
- 263 • screening of blood, breath, or urine for alcohol (and alcohol metabolites);
- 264 • level of validated biochemical alcohol consumption markers ( $\gamma$ -GT, CDT, MCV, ASAT, ALAT)
- 265 and further more accurate markers, as soon as they are validated;
- 266 • urine test for illicit drugs;
- 267 • SF-36.

268 **Stratification variables**

269 Out of the list of above mentioned descriptive features, it is recommended to stratify for severity of  
270 alcohol dependence as well as for patients without prior treatment and treatment resistant patients.

271 **4.2 Methods to assess efficacy**

272 **4.2.1 Definition of the primary endpoints**

273 In general, depending on the (supposed) mechanism of action of new specific compounds different  
274 approaches might be appropriate. In the light of addiction research the ultimate treatment goal in  
275 alcohol dependent patients is stable abstinence by prevention of relapse after detoxification. However,  
276 as a first step also clearly clinically significant reduction in alcohol consumption promoted by a



277 specific pharmacological agent, with subsequent harm reduction might be a valid intermediate goal on  
278 the way to full abstinence.

279 • **Full abstinence goal** (relapse prevention after detoxification)

280 If the study drug is addressing the ultimate goal of full recovery, the continued abstinence rate after  
281 detoxification at the end-of-active treatment period and the continued abstinence rate 12 months after  
282 end-of-active treatment should be the two primary endpoints.

283 In the beginning of the trial (up to 6 weeks) slips or lapses, but no relapse to heavy drinking, might be  
284 allowed. After the first 6 weeks relapse should be defined as any amount of drinking. However,  
285 patients should not be lost to follow up when having a relapse (or later lapse or slip), but should be  
286 further assessed with respect to significant moderation outcomes i.e. more abstinent days and less  
287 heavy drinking. Therefore, possible relapses should be thoroughly described regarding frequency,  
288 duration and amount of pure alcohol in grams per drinking day.

289 Abstinence (as well as the number and severity of possible relapses) should be confirmed by patient  
290 interviews and collateral information form, measurements of alcohol use markers (alcohol and alcohol  
291 metabolites in breath, blood and urine) and qualified validated liver biomarkers.

292 • **Intermediate harm reduction goal** (significant moderation without prior detoxification)

293 In case an alcohol dependent patient is not able or willing to get abstinent immediately (or e.g. waiting  
294 for the admission in an abstinence-orientated rehabilitation programme), also a clinically significantly  
295 reduced alcohol intake with subsequent harm reduction is a valid, although only intermediate,  
296 treatment goal, since it is recognized that there is a clear medical need also in these patients. However,  
297 it is necessary to aim at maintained abstinence as soon as the patient gets ready for it. Therefore, if the  
298 study drug is only addressing the intermediate goal of clinically significant moderation, efficacy  
299 should be expressed by change to baseline in total consumption of alcohol (presented as amount of  
300 pure alcohol in grams per day) as well as by reduction in number of Heavy Drinking Days (HDD  
301 defined as more than 60 grams of pure alcohol in men and 40 grams in women). Both are considered  
302 primary variables, since HDD are associated with specific risks such as acute cardiovascular outcomes  
303 or accidents. A clinically relevant difference compared to placebo should be demonstrated.

304 Further efficacy on these two variables should be reflected in a clearly expectable improved health  
305 outcome on an individual patient level. Therefore efficacy should also be evaluated in terms of  
306 responders. This could be done by evaluating the proportion of subjects with a 50%, 70% and 90%  
307 reduction in alcohol consumption as well as the proportion of patients achieving maintained  
308 abstinence. Another option would be evaluating the proportion of subjects with a significant  
309 categorical shift in WHO risk levels of drinking (i.e. proportion of patients with change of  
310 consumption to baseline from very high risk to at least medium risk level and change from high risk to  
311 at least low risk level (see also 1.3), as well as the proportion of patients with full abstinence.

312 Of note, in the beginning of such trials it might be necessary to slowly reduce the alcohol consumption  
313 in order to avoid marked withdrawal symptoms.

314 **4.2.2 Definition of secondary endpoints**

315 *Secondary endpoints in case of full abstinence goal:*

316 Important secondary endpoints:

- 317 • Time to relapse (first drink);
- 318 • CGI Severity and CGI Improvement;
- 319 • SF 36;
- 320 • Change to baseline of validated liver biomarkers.

321 *Further useful variables to be monitored:*

322 Compliance to treatment:

323 Medication compliance (pill counts, MEMS caps (Medication Event Monitoring System) etc.).

324 Compliance to study:  
325 % completers, Weeks on study, Time to withdrawal.

- 326 • Further course of drinking behaviour if relapse occurs (number of drinking days since first relapse,  
327 number of heavy drinking days since first relapse, cumulative abstinence duration).
- 328 • Change to baseline in number of abstinent days (cumulative abstinence duration).
- 329 • Change to baseline in physical, cognitive and psychic functions.
- 330 • Impact on social and family life and work.
- 331 • Change in the level of alcohol dependence severity measured by the validated instrument used at  
332 baseline, such as the SDAQ (Severity of alcohol dependence questionnaire), ASI (Addiction  
333 Severity Index) or ADS (Alcohol dependence Scale).
- 334 • Craving/urge to drink assessment by interviews/patient self-report instruments and e.g. the  
335 obsessive compulsive drinking scale.

336 ***Secondary endpoints in case of harm reduction goal***

337 *Important secondary endpoints:*

- 338 • Change to baseline in validated liver biomarkers;
- 339 • CGI Severity and CGI Improvement;
- 340 • SF 36.

341 *Further useful endpoints variables to be monitored:*

342 Compliance to treatment:  
343 Medication compliance (pill counts, MEMS caps (Medication Event Monitoring System) etc.).

344 Compliance to study:  
345 % completers, Weeks on study, Time to withdrawal.

- 346 • Course of alcohol consumption over time.
- 347 • Change to baseline in number of abstinent days (cumulative abstinence duration).
- 348 • Change to baseline in physical, cognitive and psychic functions.
- 349 • Impact on social and family life and work.
- 350 • Change in the level of alcohol dependence severity measured by the validated instrument used at  
351 baseline, such as the SDAQ (Severity of alcohol dependence questionnaire), ASI (Addiction  
352 Severity Index) or ADS (Alcohol dependence Scale).
- 353 • Craving/urge to drink assessment by interviews/patient self-report instruments and e.g. the  
354 obsessive compulsive drinking scale.

355 Of note, validated biomarkers (CDT, GGT, MCV, ASAT, ALAT) should be used at baseline and  
356 followed during the course of treatment as secondary outcome variables to monitor the effect of  
357 treatment. However, currently used biomarkers reflect only damage and can be confounded by age,  
358 gender, other substances and diseases, e.g. MCV is superior in women and only a marker of second  
359 choice in men. Therefore combination of markers is necessary. In future probably new biomarkers will  
360 be validated e.g. different direct ethanol metabolites (with possible verification or exclusion of  
361 relapses or amount of alcohol intake in different periods of time). This new validated biomarkers  
362 should then be used in addition to customary biomarkers.

### 363 **4.3 Strategy and design of clinical trials**

#### 364 **4.3.1 Pharmacokinetics/Pharmacodynamics**

365 PK studies should be performed in accordance to guidance on Pharmacokinetic Studies in Man.  
366 Furthermore trials which prove the assumed mechanism of action should be conducted.

367 Pharmacokinetic and pharmacodynamic interactions with, especially CNS-active, drugs expected to be  
368 frequently used in alcohol dependent patients, should be investigated, unless there is clear evidence  
369 that an interaction is unlikely to occur.

370 A tolerability and pharmacokinetic study should be performed in subjects with hepatic dysfunction, as  
371 this condition is very common in alcohol dependent patients, unless the product is not metabolised.

#### 372 **4.3.2 Dose response**

373 Dose response studies should be performed in a placebo-controlled, parallel group, double-blind,  
374 randomised, fixed-dose design, using at least three dosages, to establish the lower end of the clinical  
375 effective dose range and the optimal dose. Investigation of drug plasma levels might be supportive for  
376 dose-selection.

#### 377 **4.3.3 Therapeutic confirmatory studies**

378 Confirmatory studies should be randomised, double-blind, parallel-group and placebo controlled and  
379 designed to demonstrate superiority. In case of inclusion of an active control the choice and dose of  
380 the comparator should be justified on the basis of placebo-controlled evidence of efficacy of the  
381 comparator. Currently available treatments have shown only inconsistent, modest treatment effects.  
382 Due to this a definition of a reliable non-inferiority margin is deemed hardly possible and therefore a  
383 non-inferiority trial versus an active control is currently not considered to provide convincing evidence  
384 for efficacy of a new treatment.

##### 385 **a. Duration of confirmatory trials**

386 The duration of the active treatment period of confirmatory phase 3 trials strongly depends on the time  
387 of onset of any treatment effect and the mode of action of the new compound, as demonstrated in  
388 pharmacodynamic and exploratory studies. In the past, significant reductions of dependence or alcohol  
389 use compared to placebo could be shown in alcohol dependence studies after active treatment of 3 to 6  
390 months, using total abstinence rate or variables indicating reduction of alcohol consumption as the  
391 primary outcome criterion.

392 Therefore, in order to establish short-term efficacy, an active treatment period of 3 to 6 months,  
393 followed by a sufficiently long randomized withdrawal phase in order to investigate possible rebound  
394 phenomena, is necessary. Additionally preliminary information regarding maintenance of effect  
395 should be demonstrated.

396 However, since treatment results after the first 3 to 6 months remained very unstable in prior  
397 investigations and usually become really stable not before around 15 months, the overall outcome  
398 measurement should cover such a period of time. This is necessary in order to establish if stable  
399 treatment results have been achieved that do no longer need pharmacological support.

400 Therefore, in order to establish long-term maintenance of abstinence in case of a new compound  
401 aiming to promote continued abstinence, the active treatment phase of at least 3 months should be  
402 followed by a double-blind continuation phase without treatment until 15 months after randomization.

403 In principle the same applies for a new compound aiming to promote stable clinically significant  
404 moderation for the longer term. However, it is acknowledged that in these patients there might be the  
405 need of continued administration of active treatment. In this case a subsequent double-blind placebo-  
406 controlled phase in initial responders until 15 months is recommended. However, as mentioned before,  
407 it is absolutely necessary to aim at maintained abstinence as soon as the patient gets ready for it

##### 408 **b. Methodological considerations**

409 Relapse prevention trials (or relapse prevention phase if detoxification is part of the trial) as well as  
410 harm reduction trials should be conducted in an outpatient setting, since this reflects the most  
411 naturalistic setting.

412 Currently all methods to verify continued abstinence status or establish extent of alcohol consumption  
413 have their own advantages and limitations. Therefore, a combination of these methods is necessary. It  
414 is recommended to integrate information from patient interviews, reliable informants (collateral  
415 reporting) and (electronic) patient diaries in a combined result in the Timeline-follow-back calendar  
416 method, applied by a specifically experienced investigator. Furthermore the TLFB results should be  
417 correlated with the results of the validated biomarkers. Companies are encouraged considering  
418 additional use of further more objective measuring methods of alcohol consumption, e.g. regular use  
419 of breathalyzers, better biomarkers or other innovative developments as soon as they are validated.  
420 Regular visits, at least every two weeks, should be scheduled throughout the active treatment period.  
421 Concerning long-term follow-up, the visits should take place at least once a month.

422 Psychosocial interventions are currently the backbone of treatment in alcohol use disorders (such as  
423 Brief Intervention und Motivational enhancement) and licensed pharmacological treatments for  
424 alcohol dependence are indicated only as adjunctive, therefore psychosocial interventions should be  
425 allowed in alcohol dependence trials. However, it is important that the demonstrated effects in the  
426 trials are not primarily due to these interventions. In order to assign a certain part of the effects to the  
427 specific pharmacologic treatment, the kind of psychosocial intervention should be prospectively and  
428 exactly defined in the protocol, have a known effect size, should be fully standardized as well as kept  
429 to a low and constant level during the trial for all included patients.

430 In order to minimize poor treatment adherence and high discontinuation rates, which frequently led to  
431 compromised validity of the results in prior alcohol dependence studies, efforts should be made in the  
432 design to enhance compliance to treatment (which should be monitored) and to reduce the number of  
433 discontinuations. Discontinuing patients should be followed up and the reasons for discontinuation  
434 should be documented. The effect of missing values will need to be taken into account in the efficacy  
435 analysis and the method to address this problem needs to be pre-specified.

436 For references to the methodological EMEA guidance documents, see Section 3.

#### 437 **4.4 Studies in special populations**

##### 438 *Children*

439 Studies in children are not deemed necessary, since alcohol dependence is not a problem in this age  
440 group.

##### 441 *Adolescents*

442 Alcohol use in general (above all binge-drinking) is the leading risk factor for premature death in this  
443 population especially due to alcohol-related accidents, violence and suicide. However, this guideline  
444 focuses on alcohol dependent persons and since alcohol dependence develops over years of chronic  
445 heavy drinking it rather rarely is an issue in adolescents. Nevertheless, the number of adolescents with  
446 alcohol use disorders in general is increasing in Europe and also due to the new paediatric regulation  
447 (EC) No 1901/2006 it is recommended to include alcohol dependent adolescents in the development  
448 program according to the prevalence in the general population (see Section 3 of this guidance  
449 document).

##### 450 *Gender*

451 Women appear to be more vulnerable for the toxic effects of alcohol due to less body water and lower  
452 activity of gastric alcohol-dehydrogenase. They also show a different course of disease with faster  
453 development of alcohol dependence than men, a higher risk for alcohol-related diseases and more  
454 additional substance abuse. Furthermore major depressive disorders and anxiety disorders are twice as  
455 high in female alcoholics than in men. Therefore in clinical trials stratification might be considered. In  
456 any case, the number of included women should reflect the prevalence of alcohol dependence in  
457 women in the general population. Pharmacokinetic data should be gathered in both females and males.

##### 458 *Elderly (aged 65 or older)*

459 The pattern and prevalence of alcohol related disorders is still poorly documented in elderly. Risky  
460 drinking and combination of psychotropic drug(s) and alcohol have been reported in a significant  
461 percentage of elderly in both genders. Alcohol dependence (with very late onset) is often undiagnosed.  
462 The expected benefits from alcohol dependence treatment are important, particularly for the elderly  
463 patients with underlying co-morbidities which may increase organ-alcohol damages.

464 The main aspects to be investigated in this special population are: 1) pharmacokinetic profile, relevant  
465 as guidance for dose adjustments; 2) safety with focus on drug interactions and cardiovascular effects  
466 related to possible concomitant/underlying cardiovascular disorders. For safety assessments, a  
467 sufficient number of elderly subjects should be included in the trials (see Studies in support of special  
468 populations: geriatrics – CPMP/ICH/379/99 (ICH E7, section 4.5.1) and the Concept Paper ICH  
469 E7(R1) published in 2008 for guidance on this point).

#### 470 *Psychiatric co-morbidity*

471 See Section 4.1.2

### 472 **4.5 Clinical safety evaluation**

#### 473 **4.5.1 General considerations**

474 For references to the relevant safety guidance, see Section 3.

#### 475 **4.5.2 Specific adverse events**

476 Pharmacokinetic and pharmacodynamic interaction studies with alcohol are obligatory before starting  
477 phase III, since subjects will be allowed to drink (in case of harm reduction trials) or might have  
478 relapses during active treatment.

479 Patients should be carefully monitored regarding possible suicidal ideation or suicide attempts.

#### 480 *Addiction potential*

481 Reinforcing/addiction potential of the test drug should be assessed to rule out switch of addiction.

482 **DEFINITIONS**

483 The WHO glossary should be used for definitions.  
484 [http://www.who.int/substance\\_abuse/terminology/en/](http://www.who.int/substance_abuse/terminology/en/)

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