

**Hayashi's problem**  
**The use of regulatory information for research synthesis**

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A recent survey has shown that only 10% of Cochrane reviews make serious efforts to search for and include unpublished material. The recent series of cases of exposure of sponsor bias changing our understanding (and in some cases the registration) of important interventions (second generation antipsychotics, rosiglitazone, riboxetine, viox, tamiflu) has shown that reliance on published material can be highly misleading. Journals (and ultimately research synthesisers and decision-makers) are usually presented with a very short summary of a selected trial which is part of a larger research programme. Given the growing realization that these form a potentially biased evidence base, we may need to develop explicit methods for including regulatory material in systematic reviews or require producers to make all material available to journals (an unrealistic option). First however we need to know this is feasible and worthwhile. Tom Jefferson will present and discuss some of these issues on the basis of the oseltamivir (Tamiflu) review, starting with the story of how his team realized their previous Cochrane review on Tamiflu were biased and how they went about addressing the issue.

“Our 2006 neuraminidase inhibitors (NI) for influenza Cochrane review was misleading. Its optimistic findings were wholly based on a mixture of published and glimpses of unpublished material taken at face value without adequate critical appraisal. Efforts to ascertain the presence or extent of publication bias were not in depth. Subsequent versions of the review have revealed the existence of considerable reporting bias. Industry has no obligation to publish all its trials, but are bound to disclose them to regulators when seeking registration. Thanks to UK NIHR funding, we are at present updating our NI review by looking only at unpublished data to minimise the risk of any type of reporting bias. Our current review includes both internal pharma trial reports which are 200-300 fold larger than their published counterparts and regulatory files. These are either currently available or requested through FOIA rules from the FDA, UK NICE, EMA and Japanese PMDA. So far regulatory material (in the guise of new drug application appraisal reports) has proved invaluable in integrating internal trials reports and providing additional information for their critical interpretation.”

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### **Main related publications:**

Jefferson T, Demicheli V, Rivetti D, Jones M, Di Pietrantonj C, Rivetti A. Antivirals for influenza in healthy adults: systematic review. *Lancet* 2006;367:303-13.

Jefferson T, Demicheli V, Di Pietrantonj C, Jones M, Rivetti D. Neuraminidase inhibitors for preventing and treating influenza in healthy adults. *Cochrane Database of Systematic Reviews* 2006;(3):CD001265.

Jefferson T, Jones M, Doshi P, Del Mar C. Neuraminidase inhibitors for preventing and treating influenza in healthy adults: systematic review and meta-analysis. *BMJ* 2009;339:b5106

Doshi P. Neuraminidase inhibitors: the story behind the Cochrane review. *BMJ* 2009;339:b5164

Cohen D. Complications: tracking down the data on oseltamivir. *BMJ* 2009;339:b5387.

Godlee F, Clarke M. Why don't we have all the evidence on oseltamivir? *BMJ* 2009;339:b5351

Editor's Choice: We want raw data, now. *BMJ* 2009; 339 doi: 10.1136/bmj.b5405

Smith J, on behalf of Roche. Point-by-point response from Roche to BMJ questions. *BMJ* 2009;339:b5374.

Jefferson T, Jones MA, Doshi P, Del Mar CB, Heneghan CJ, Hama R, Thompson MJ. Neuraminidase inhibitors for preventing and treating influenza in healthy adults and children. *Cochrane Database of Systematic Reviews* 2012, Issue 1. Art. No.: CD008965. DOI: 10.1002/14651858.CD008965.pub3.

Doshi P, Jones MA, Jefferson T. Rethinking credible evidence synthesis. *BMJ* 2012;344:d7898 doi: 10.1136/bmj.d7898.

Drug Data Shouldn't Be Secret by Peter Doshi and Tom Jefferson

The New York Times, April 10, 2012. URL:

<http://www.nytimes.com/2012/04/11/opinion/drug-data-shouldnt-be-secret.html> Shortened URL: <http://nyti.ms/lvgh9c>

Doshi P, Jefferson T, Del Mar C (2012) The Imperative to Share Clinical Study Reports: Recommendations from the Tamiflu Experience. *PLoS Med* 9(4): e1001201.

doi:10.1371/journal.pmed.1001201

Short URL: <http://bit.ly/HIbwqO>. PDF for printing: <http://bit.ly/HFBYTV>

Jones M, Hama R, Jefferson T, Doshi P. Neuropsychiatric Adverse Events and Oseltamivir for Prophylaxis *Drug Saf* 2012; 35 (12): 1187-1190.

Tamiflu open data campaign

<http://www.bmj.com/tamiflu>

Also:

Editorial

Godlee F. Clinical trial data for all drugs in current use. *BMJ* 2012;345:e7304 doi: 10.1136/bmj.e7304 (Published 29 October 2012)

<http://www.bmj.com/content/345/bmj.e7304>

Feature

Payne D. Tamiflu: the battle for secret drug data. *BMJ* 2012;345:e7303 doi: 10.1136/bmj.e7303 (Published 29 October 2012)

<http://www.bmj.com/content/345/bmj.e7303>

News

Zosia Kmietowicz. Academics plea for politicians to tackle problem of missing data. *BMJ* 2012;345:e7306 doi: 10.1136/bmj.e7306 (Published 29 October 2012)

<http://www.bmj.com/content/345/bmj.e7306>

Correspondence

Godlee F. Open letter to Roche about oseltamivir trial data *BMJ* 2012;345:e7305 doi: 10.1136/bmj.e7305 (Published 29 October 2012).

<http://www.bmj.com/content/345/bmj.e7305>

Podcast (click on the fish icon right hand side, upper corner of webpage)

<http://www.bmj.com/multimedia>

[http://www.nytimes.com/2012/11/01/business/british-medical-journal-to-require-detailed-clinical-trial-data.html?\\_r=0](http://www.nytimes.com/2012/11/01/business/british-medical-journal-to-require-detailed-clinical-trial-data.html?_r=0)

Watch Tom Jefferson relate the story on: <http://www.youtube.com/watch?v=pTrqsif0KWM>

<http://blog.okfn.org/2012/11/19/the-tamiflu-story-why-we-need-access-to-all-data-from-clinical-trials/>