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# Retinoid-containing medicinal products Art.31 referral

Analysis of case reports in EudraVigilance to inform decision making in the context of a referral procedure

Substance(s) (INN)	Acitretin, Adapalene, Alitretinoin, Bexarotene, Isotretinoin, Tretinoin,		
	Tazarotene		
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## 1. List of abbreviations

EEA: European Economic Area

EMA: European Medicines Agency

EV: EudraVigilance

EVCTM: EudraVigilance Clinical Trial module

EVPM: EudraVigilance Post-Authorisation module

INN: International Non-proprietary Nomenclature

MAH: Marketing Authorisation Holder

MedDRA: Medical Dictionary for Regulatory Activities

PRAC: Pharmacovigilance Risk Assessment Committee

PRR: Proportional reporting ratio

PT: MedDRA Preferred Term

SMQ: Standardised MedDRA Query SOC: MedDRA System Organ Class

SmPC: Summary of Product Characteristics

## 2. Responsible parties

Responsible parties	Name
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## 3. Milestones

Steps	Planned date	Actual date
Draft analysis plan sent to Rapporteurs		20/01/2021
Data quality check (de-duplication, recoding)	22/07/2016	19/07/2016
Exploratory analysis	31/08/2016	31/08/2016

Steps	Planned date	Actual date
Analysis completed	15/09/2016	22/09/2016
Study report completed	21/09/2016	23/09/2016
Study report signed-off	23/09/2016	27/09/2016

## 4. Introduction and background

On 8 July 2016 the Medicines and Healthcare Products Regulatory Agency (MHRA) identified the need for detailed assessment of the possible risk of neuropsychiatric disorders associated with the use of retinoid products and referred the matter to the Pharmacovigilance Risk Assessment Committee (PRAC). Warnings about this possible risk are already included in the product information for some of these medicines. The Committee will review the extent and nature of these warnings to ensure that they reflect the available evidence for oral and topical retinoids.

In addition, the PRAC will concomitantly conduct a review of the measures currently in place for pregnancy prevention for retinoid containing medicinal products, including the warnings and recommendations in the product information, to ensure that they are effective and appropriate.

As retinoid-containing medicinal products are marketed by several MAHs, the data that will be provided by the MAHs will be truncated according to each MAH's own reports. Hence, in view of providing a more comprehensive overview of the evidence available the Signal and Incident Management team initiated an analysis of the EudraVigilance data.

#### 5. Aims

The aim of the EudraVigilance analysis is to provide a comprehensive overview of the case reports of neuropsychiatric adverse events associated with the use of retinoid-containing medicinal products.

# 6. Methodology

#### 6.1. Case definitions

#### 6.1.1. Neuropsychiatric reaction

A case report was considered as a report of a neuropsychiatric reaction if any preferred term from the SOC Psychiatric disorders was reported.

#### 6.1.2. Self-injury-specific mortality

Psychiatric disorders typically only lead to fatal outcome when self-destructive behaviour occurs, i.e. suicide. However, other adverse reactions that lead to a fatal outcome may be reported in the case reports (e.g. toxic epidermal necrolysis), hence a case's seriousness may be coded as fatal but not be related to self-injury. To differentiate cases where the patient died from a different reaction, we report on the self-injury-specific mortality by selecting the reaction outcome field [ICH E2B(R2) B.2.i.8] rather than reporting on the seriousness field [ICH E2B(R2) A.1.5.2.]

Case reports were thus considered as a fatal case of self-injury where the outcome of a reported preferred term from the Depression and suicide/self-injury level 1 SMQ was fatal or the report included the MedDRA term Completed suicide.

### 6.2. Classification of exposure

Each individual retinoid may have more than one reported Scientific Composition (High Level), e.g. *isotretinoin* and *erythromycin, isotretinoin*. To facilitate comparison, we grouped Scientific Compositions (High Level) under the respective INN, hence all combinations containing specific retinoids are reported under the respective retinoid's INN (e.g. *Isotretinoin* contains case reports for *isotretinoin* and *erythromycin, isotretinoin*).

#### 6.3. EudraVigilance search strategy

Data quality verification (de-duplication, recoding of medicinal products) was conducted in July 2016 to ensure a reliable data set for the conduct of the analysis and was concluded on 19 July 2016.

EudraVigilance was queried for all case of neuropsychiatric disorders reported in association with any retinoid-containing medicinal product from inception up to 19 July 2016.

Table 1: EudraVigilance search criteria

Data quality sign-off	19 July 2016
Query time period	Cases with receive date until 19 July 2016
Substances	Single or multi-ingredient formulations of Acitretin, Adapalene, Alitretinoin, Bexarotene, Isotretinoin, Tretinoin, Tazarotene
Events of interest (MedDRA v.19.0)	Psychiatric disorders SOC

#### 6.3.1. Data analysis technique

From the data extracted, analyses were run of the distribution of reports per retinoid, route of administration, reporting year (receive date), location (country), demographic characteristics (age groups, gender), medical history (history of psychiatric disorders) and duration of treatment. Where possible, correlations of the abovementioned variables were provided.

To report on relevant MedDRA PTs, PRRs were used as a disproportionality metric and were calculated for each INN and MedDRA PT.

This data was analysed cumulatively for all retinoids, stratified by individual retinoid and stratified by route of administration. Output tables were adjusted accordingly. The analysis pertaining to fatal cases resulting from self-injury was presented separately as a subgroup analysis.

As the exploratory analysis revealed thousands of case reports for the System Organ Class (SOC) Psychiatric disorders, individual case safety reviews were not produced systematically but only where the data allowed a focused discussion.

#### 7. Results

#### 7.1. Pooled cases

#### 7.1.1. Summary tabulations

There are 10,295 case reports of acitretin, adapalene, alitretinoin, bexarotene, isotretinoin, tazarotene and tretinoin-containing medicinal products and any reaction from the Psychiatric SOC in EV reported up to 19 July 2016. Of these, roughly 96% refer to psychiatric adverse reactions where isotretinoin was considered a suspect or interacting medicinal product (Table 2).

As a sensitivity analysis, we ran an extended retinoid search including retinol, etretinate and vitamin A preparations, which accounted for an additional 145 case reports in the database.

**Table 2: Distribution of case reports per International Non-proprietary Nomenclature.** The count of retinoids in the scope of the referral is the total count of cases for the list of substances in the Appendix I – INN and Scientific Composition (High Level). Also showing, for information only, the total count of cases for all other retinoids (according to ATC DDD) which were not in the scope of the referral. Count of individual INNs should not be summed, as there are cases where more than one INN was reported.

INN	Count Cases
Retinoids in the scope of the referral	10,295
Acitretin	123
Adapalene	10
Alitretinoin	225
Bexarotene	14
Isotretinoin	9,866
Tazarotene	2
Tretinoin	59
All other retinoids in EV	145

The oral route of administration was the most frequently reported route of administration in the case reports. Noticeably, 4,792 case reports<sup>1</sup> (46%) either had no information coded for the route of administration or were coded as route unknown.

**Table 3: Distribution of case reports per administration route.** Rows should not be summed as individual case reports may have coded more than one route of administration

Administration Route	Count Cases
Oral use	5,772
Unknown use	4,304
Not Available	584
Topical use	26
Transplacental use	10
Cutaneous use	4
Intrauterine use	4
Other use	2
Transdermal use	1

<sup>&</sup>lt;sup>1</sup> The count is different to the sum of rows in Table 3 as per the reason mentioned in the table.

Concerning the distribution of case reports by primary source qualification of the reporter and by receive year, the number of reports of the Psychiatric SOC (for the retinoids in the scope of the referral) seems to have been relatively stable between 1998 and 2009, similarly, the count of cases for reports per primary source qualification was relatively consistent (Figure 1).

In the three years from 2010 to 2012, there was a large increase in the count of case reports, which seems to correlate with a substantive increase in the case reports from non-healthcare professionals. This peak returned to roughly the same 1998-2009 values from 2013 onwards.

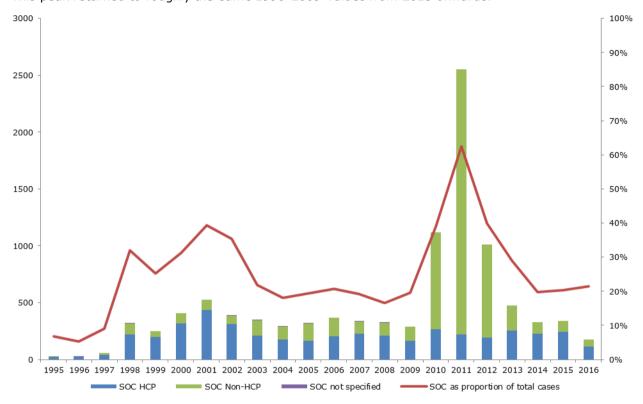


Figure 1: Distribution of case reports of Psychiatric SOC (total and from Non-HCP) by primary source qualification and per receive year (01/01/1995 - 19/07/2016). Line shows the proportion of case reports of Psychiatric SOC as compared to the total count of cases for the year.

Case reports tend to refer more frequently to patients of male gender (Table 4). In all age groups, up until the 30-34 age groups, there are more reports of male patients (the difference is greater between ages 15-29). This trend inverts from the age of 35, and from then onwards female gender is always more reported, apart from the age group 75-79 which has the same counts for both genders.

Table 4: Distribution of case reports by age group (5-year intervals) and gender.

Age group	Female	Male	Not Specified
0-4	8	17	1
5-9	3	6	
10-14	144	147	2
15-19	814	1386	12
20-24	580	735	5
25-29	611	755	2
30-34	581	623	

Age group	Female	Male	Not Specified
35-39	475	433	1
40-44	435	333	4
45-49	314	243	1
50-54	219	148	1
50-59	150	76	1
60-64	85	51	
65-69	37	20	
70-74	15	14	
75-79	6	6	
80-84	4	6	
85+	5	1	
Not available	283	281	215

Most reports are from the United States (72%) (Table 5) and the top ten countries account for 95% of the reports in EudraVigilance. In total, the EEA received 1,942 case reports (19%) of all case reports.

Table 5: Distribution of case reports by primary source country (top 15 most frequent).

Primary Source Country	Count Cases	Prop. (%)
United States	7,456	72%
France	624	6%
United Kingdom	496	5%
Brazil	271	3%
Germany	253	2%
Australia	197	2%
Canada	188	2%
Sweden	124	1%
Switzerland	97	1%
Denmark	81	1%
Ireland	80	1%
Netherlands	60	1%
Spain	37	0%
Belgium	33	0%

#### 7.1.2. Events of interest

Depressive disorders, Suicidal, self-injurious behaviour, Anxiety symptoms and Emotional and mood disturbances NEC are the four most reported HLTs of the Psychiatric disorders SOC (Table 6).

**Table 6: Distribution of case reports by reaction at HLT level (top 20 most frequently reported HLTs).** Rows should not be summed as individual case reports may have coded more than one reaction.

Reaction HLT	Count Cases
Depressive disorders	6,643
Suicidal and self-injurious behaviour	2,827

Reaction HLT	Count Cases
Anxiety symptoms	1,759
Emotional and mood disturbances NEC	1,623
Behaviour and socialisation disturbances	495
Mood alterations with depressive symptoms	423
Disturbances in initiating and maintaining sleep	350
Fluctuating mood symptoms	339
Psychotic disorder NEC	281
Panic attacks and disorders	278
Mental disorders NEC	268
Bipolar disorders	214
Abnormal behaviour NEC	185
Perception disturbances	175
Confusion and disorientation	134
Sleep disorders NEC	125
Affect alterations NEC	122
Mood disorders NEC	115
Obsessive-compulsive disorders and symptoms	110
Eating disorders NEC	86

There are 254 different MedDRA PTs from the Psychiatric SOC reported in association with retinoids, to focus the results we considered the PTs for the four most frequently reported HLTs (Table 7). Depression tops the list of PTs and is reported roughly 3.5 times more often than the second most reported term in the list.

Table 7: Distribution of case reports by reaction at PT level (top 20 PTs most frequently reported in the top 4 most reported HLTs). Rows should not be summed as individual case reports may have coded more than one reaction.

Reaction PT	Count Cases
Depression	6,530
Suicidal ideation	1,853
Anxiety	1,309
Emotional distress	1,038
Suicide attempt	688
Stress	410
Completed suicide	369
Mood altered	255
Irritability	179
Anger	128
Major depression	101
Agitation	87
Emotional disorder	83
Self-injurious ideation	60
Intentional self-injury	58

Reaction PT	Count Cases
Nervousness	41
Self injurious behaviour	32
Suicidal behaviour	30
Depression suicidal	17
Persistent depressive disorder	14

Table 8 shows the list of PTs from the Psychiatric SOC where a disproportional PRR was identified, sorted by descending order of 95% confidence interval lower bound.

**Table 8: List of INN and reaction PT that reached the threshold for signal of disproportionality.** PRR values sorted in descending order of lower bound.

INN	Reaction PT	Count Spontaneous	PRR (-)
Alitretionin	Emotional poverty	3	37.21
Alitretionin	Depressed mood	48	35.70
Isotretinoin	Depression	6,177	18.13
Alitretionin	Mood altered	12	13.78
Isotretinoin	Bulimia nervosa	21	13.61
Alitretionin	Depressive symptom	4	13.59
Isotretinoin	Anorexia nervosa	15	13.54
Isotretinoin	School refusal	8	13.08
Isotretinoin	Social anxiety disorder	19	12.68
Alitretionin	Listless	5	9.93
Isotretinoin	Suicidalideation	1,564	9.87
Isotretinoin	Emotional distress	1,037	9.44
Alitretionin	Decreased interest	3	9.41
Isotretinoin	Bipolar disorder	175	8.95
Isotretinoin	Generalised anxiety disorder	25	8.30
Isotretinoin	Adjustment disorder with mixed anxiety and depressed mood	4	7.83
Alitretionin	Depression	60	7.47
Isotretinoin	Brief psychotic disorder with marked stressors	8	7.46
Isotretinoin	Affect lability	99	7.42
Isotretinoin	Stress	405	7.34
Isotretinoin	Adjustment disorder	21	7.08
Isotretinoin	Mood swings	295	7.04
Isotretinoin	Attention deficit/hyperactivity disorder	59	6.76
Isotretinoin	Major depression	94	6.59
Alitretionin	Loss of libido	3	6.55
Isotretinoin	Obsessive-compulsive disorder	92	6.29
Isotretinoin	Mood altered	196	6.13
Alitretionin	Tension	3	6.13
Isotretinoin	Social avoidant behaviour	60	6.04
Alitretionin	Sleep disorder	13	5.54
Isotretinoin	Self-injurious ideation	36	5.52
Isotretinoin	Depressive symptom	45	5.41
Isotretinoin	Panic attack	227	4.92
Isotretinoin	Persistent depressive disorder	13	4.69
Isotretinoin	Postpartum depression	7	4.66
Isotretinoin	Morbid thoughts	13	4.50
Isotretinoin	Dissociative identity disorder	4	4.35
Isotretinoin	Mentaldisorder	241	4.24
Alitretionin	Thinking abnormal	4	4.23
Isotretinoin	Bipolar I disorder	24	4.22
Isotretinoin	Affective disorder	43	4.20
Alitretionin	Suicidalideation	18	4.15
Isotretinoin	Post-traumatic stress disorder	36	4.12
Isotretinoin	Body dysmorphic disorder	5	4.07
Alitretionin	Mood swings	6	4.02
Isotretinoin	Personality change	70	3.87
Isotretinoin	Antisocial behaviour	10	3.83
Isotretinoin	Panic disorder	34	3.78
Isotretinoin	Suicide attempt	632	3.76
	Borderline personality disorder	6	3.74
Isotretinoin			

INN	Reaction PT	Count Spontaneous	PRR (-)
Isotretinoin	Automatism	Spontaneous 5	3.68
Isotretinoin	Anxiety	1,224	3.44
Isotretinoin	Bipolar II disorder	4	3.38
Isotretinoin	Negative thoughts	16	3.23
Isotretinoin	Anxiety disorder	29	3.17
Isotretinoin	Schizophrenia	74	3.12
Isotretinoin	Intentional self-injury	48	3.12
Isotretinoin	Depressed mood	194	2.87
Isotretinoin	Psychotic disorder	230	2.86
Isotretinoin	Anger	109	2.81
Isotretinoin	Violence-related symptom	13	2.69
Isotretinoin	Asocial behaviour	3	2.61
Isotretinoin	Emotional disorder	78	2.60
	Phobia	9	2.60
Isotretinoin		4	
Isotretinoin	Morose Prychotic hobbyjour	12	2.42
Isotretinoin	Psychotic behaviour		2.36
Alitretionin	Anxiety	21	2.33
Isotretinoin	Schizophreniform disorder	5	2.28
Isotretinoin	Feelingguilty	7	2.26
Alitretionin	Irritability	7	2.25
Isotretinoin	Decreased interest	20	2.19
Isotretinoin	Paranoia	76	2.18
Isotretinoin	Adjustment disorder with depressed mood	12	2.18
Isotretinoin	Acute psychosis	20	2.16
Isotretinoin	Abnormal behaviour	161	2.07
Isotretinoin	Depression suicidal	13	2.05
Isotretinoin	Aggression	217	2.04
Isotretinoin	Completed suicide	358	1.96
Isotretinoin	Trichotillomania	3	1.94
Isotretinoin	Suicidalbehaviour	24	1.91
Isotretinoin	Feelings of worthlessness	6	1.88
Isotretinoin	Selfinjurious behaviour	22	1.88
Isotretinoin	Feeling of despair	13	1.83
Isotretinoin	Flat affect	10	1.82
Isotretinoin	Obsessive thoughts	9	1.77
Isotretinoin	Agoraphobia	6	1.73
Isotretinoin	Depersonalisation/derealisation disorder	12	1.73
Isotretinoin	Alcohol abuse	12	1.68
Isotretinoin	Psychiatric symptom	22	1.65
Isotretinoin	Self esteem decreased	7	1.62
Isotretinoin	Libido decreased	35	1.59
Isotretinoin	Impulse-control disorder	10	1.58
Isotretinoin	Flight of ideas	4	1.57
Isotretinoin	Irritability	153	1.53
Alitretionin	Restlessness	5	1.47
Isotretinoin		48	1.44
	Apathy		
Isotretinoin	Delusion	48	1.38
Isotretinoin	Abulia	5	1.35
Isotretinoin	Hallucination, auditory	49	1.35
Isotretinoin	Thinking abnormal	37	1.31
Acitretin	Suicidal behaviour	3	1.31
Alitretionin	Aggression	5	1.28
Acitretin	Psychiatric symptom	3	1.26
Isotretinoin	Tearfulness	15	1.25
Alitretionin	Insomnia	10	1.21
Isotretinoin	Selective eating disorder	13	1.17
Isotretinoin	Derealisation	7	1.17
Isotretinoin	Eating disorder	33	1.16
Isotretinoin	Loss of libido	16	1.15
Isotretinoin	Schizoaffective disorder	6	1.15
Isotretinoin	Mania	52	1.12
Isotretinoin	Learning disorder	5	1.12
Alitretionin	Agitation	6	1.11
Alitretionin	Mentaldisorder	3	1.09
Isotretinoin	Insomnia	305	1.06
Isotretinoin	Disturbance in sexual arousal	4	1.02
	Sleep disorder	97	1.01

#### 7.1.3. Indications

There are 104 indications reported at MedDRA PT level in the case reports, for ease of understanding, we grouped these in logical groups (Appendix II - Group of indications). The most frequently reported group of indications was acneiform eruptions, with only marginal numbers (<5%) for all other reported indications (Table 9).

Table 9: Distribution of case reports by group of indications. Rows should not be summed as individual case

reports may have coded more than one reaction.

Indications	Count Cases
Acneiform eruptions	7,888
Unknown indications	1,523
Eczema	161
Other skin conditions	124
Psoriasis	80
Conditions of the skin appendages	64
Lymphoid-related cutaneous conditions	37
Dermatitis	28
Other types of neoplasms	10
Other non-skin conditions	9
Skin neoplasms	6
Lichenoid eruptions	5

### 7.1.4. Medical history

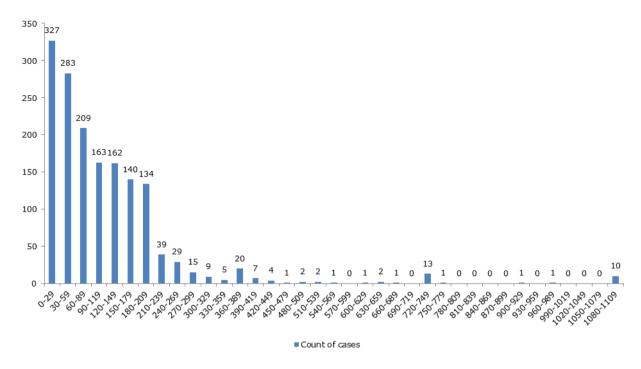
Nine-hundred and fifty six case reports (9%) have medical history of any form of depression, anxiety, suicidal ideation and suicide attempt (Table 10), most of which is depression.

Table 10: Distribution of case reports by medical history of depression, anxiety and suicide attempt or ideation. Rows should not be summed as individual case reports may have coded more than one medical history.

Medical history	Count Cases
Depression	827
Anxiety	185
Suicidal ideation	70
Suicide attempt	36

#### 7.1.5. Duration of treatment

The vast majority of cases of neuropsychiatric disorders report a treatment duration between 0 and 210 days (Figure 2).



**Figure 2: Distribution of case reports by reported duration of treatment (in 30 days interval).** Time-intervals are presented for the first 3 years.

### 7.2. Stratification by INN

Looking at the distribution of case reports by specific retinoid INN, the gender distribution is as presented in Table 11.

Table 11: Distribution of case reports by gender and INN

INN	Female	Male	Not Specified
Acitretin	65	57	1
Adapalene	8	2	
Alitretionin	133	77	15
Bexarotene	4	10	
Isotretinoin	4,524	5,117	225
Tazarotene	2		
Tretinoin	35	19	5

Interestingly, the age distribution per INN (Table 12) shows that for isotretinoin, there is a peak reporting frequency at the age of 15-19, whereas for alitretinoin that occurs later on from the age of 40. This could reflect use patterns or be a chance finding considering that the number of observations for alitretinoin are small.

Table 12: Distribution of case reports by age groups and INN.

Age		Adapalen	Alitretioni	<del></del>	Isotretinoi	Tazaroten	Tretinoi
Year	n	е	n	е	n	е	n
0-4					21		5
5-9	1				8		
10-14		2			291		
15-19	5	2	1		2,203		1
20-24		1	4		1,313		2
25-29	9		8		1,347		5
30-34	5		19		1,174		6
35-39	12		14	1	877		5
40-44	16	1	23	1	727		4
45-49	13		22		518		5
50-54	15	1	27	1	318	1	6
55-59	14		25	1	184		3
60-64	7		16	4	107		2
65-69	3		8	2	41		3
70-74	3		10	3	11		2
75-79	1		4		6		1
80-84	3		2		4		1
85+	5				1		
Not availabl e	11	3	42	1	715	1	8

Table 13 shows the distribution of case reports by reaction at HLT level.

Table 13: Distribution of case reports by reaction at HLT level (top 20 most frequently reported HLTs) and by INN. Rows are sorted in descending order by total count for all INNs. Rows should not be summed as individual case reports may have coded more than one reaction.

Reaction HLT	Acitretin	<b>Adapalene</b>	Alitretionin	Bexarotene	Isotretinoin	<b>Fazarotene</b>	Tretinoin
	Ac	Ac	₹	Be	Is	E -	Ĕ
Depressive disorders	44	6	80	4	6,503	1	7
Suicidal and self-injurious behaviour	25		24	1	2,768	1	9
Anxiety symptoms	17	3	45	3	1,685		7
Emotional and mood disturbances NEC	4	2	28		1,583		6
Behaviour and socialisation disturbances	8	1	13	1	469		3
Mood alterations with depressive symptoms	5		64	1	348	1	4
Disturbances in initiating and maintaining	6	1	15	3	316		10
sleep							
Fluctuating mood symptoms	4		9		326		
Psychotic disorder NEC	4	1	3		271		2
Panic attacks and disorders	4	1	2		271		1

Reaction HLT	Acitretin	Adapalene	Alitretionin	Bexarotene	Isotretinoin	Tazarotene	Tretinoin
Mental disorders NEC	3		4	1	257		3
Bipolar disorders	1		1		211		1
Abnormal behaviour NEC	7		2		171		5
Perception disturbances	7		4	1	160		3
Confusion and disorientation	14		3	4	104		9
Sleep disorders NEC	1	2	20	1	101		
Affect alterations NEC	1		2		119		
Mood disorders NEC			8	1	103		3
Obsessive-compulsive disorders and symptoms					110		

### 7.3. Stratification by route of administration

There are several routes of administration as mentioned in Table 3. We grouped those routes of administration into the main routes for retinoids: oral and dermal. As expected, the oral formulations of retinoids are the most frequently reported route, with only a marginal number of dermal use (Table 14).

Table 14: Distribution of case reports by routes of administration.

Administration Route	Count Cases
Oral	5,772
Dermal	31
All others	16
Unknown/not reported	4,792

As the systemic absorption of topical retinoids seems to be slow and  $small^2$ , it is important to consider the cases of neuropsychiatric reactions to dermal routes of administration carefully. From the line listing of case reports (Table 15), three case reports mention the use of antidepressants and two mention pregnancy or exposure during pregnancy. There are three case reports where suicide or suicide attempt alone were reported with no additional information on the reaction.

Table 15: Line listing of case reports exposed to retinoids via dermal routes of administration.

Safety Report ID	Primary Group Qualific ation	Year and country	Age/ Gender	Drug list	Reaction List
13213	Only Patient	2003/US	18/M	Accutane [isotretinoin] (s - acne cystic - 15/06/1972 - 121 d) Accutane [isotretinoin] (s - acne cystic - 15/06/1972 - 121 d)	Altered mood, Anxiety attack, Depression, Skin loss

 $<sup>^2</sup>$  Schaefer H. Penetration and percutaneous absorption of topical retinoids. A review. Skin Pharmacol. 1993;6 Suppl 1:17-23. Review. PubMed PMID: 8142107.

Safety Report ID	Primary Group Qualific ation	Year and country	Age/ Gender	Drug list	Reaction List
374309	Only HCP	2006/CH	40/F	Differin [adapalene] (s - n/a - n/a - n/a) Venlafaxine [venlafaxine] (c - depression - n/a - n/a)	Depression aggravated, Nose bleed
393942	Only Patient	2006/AU	29/F	Roaccutane gel [isotretinoin] (s - product used for unknown indication - 01/01/1993 - 731 d)	Suicide attempt
1576696	Only Patient	1997/US	62/F	Nortriptyline hcl [nortriptyline] (c - n/a - n/a - n/a) Renova [tretinoin] (s - skin dystrophy - 15/08/1996 - n/a) Renova [tretinoin] (s - n/a - 15/08/1996 - n/a)	Breast cancer, Burning sensation, Irritability, Redness
1587080	Only Patient	2003/US	?/F	Psychiatric drugs (nos)(qi) (c - n/a - n/a - n/a) Retin-a [tretinoin] (s - product used for unknown indication - n/a - n/a)	Asocial behavior, Burn, Hair growth increased, Photosensitive reaction, Suicidal ideation, Wrinkles
1607193	Only HCP	1996/US	32/M	Erythromycin topical solution [erythromycin] (c - n/a - n/a - n/a) Retin-a [tretinoin] (s - acne - 30/06/1996 - n/a)	Anxiety, Chapped skin, Cheilosis, Depression, Emotional distress, Eye swelling, Irritability, Laceration, Pain, Rash, Redness, Unevaluable event
1614639	Only Patient	2000/US	43/F	Anti-depressant (c - depression - n/a - n/a) Cortaid [hydrocortisone a cetate] (c - n/a - n/a - n/a) Renova [tretinoin] (s - ephelides - n/a - n/a) Renova [tretinoin] (s - therapeutic skin care topical - n/a - n/a)	Abnormal physical sensation, Anemia, Bacterial infection, Blepharoconjunctivitis, Blisters, Blurred vision, Bone injury, Chemical burns of eye, Diabetes, Dry eyes, Dry mouth, Eye infection, Eyelid margin crusting, Facial swelling, Fever, Foreign body in eye, Gastric disorder, Hemorrhage, Injury, Injury to teeth, Lung disorder, Mental disorder NOS, Migraine, Opacity comeal, Pain, Paranoid delusions, Peeling, Rhinitis, Scab, Scarring, Silicosis, Sinusitis, Skin breakdown, Sleep loss, Sores gum, Sores lip, Swelling of eyelid, Swelling of limbs, Swollen eyes, Unilateral vision loss, Vision abnormal, Weight loss, Welts, Worms
1616634	Only Patient	1997/US	29/F	Acetaminophen, codeine [codeine, paracetamol] (c - n/a - 15/03/1997 - n/a) Mineral supplement (c - n/a - n/a - n/a) Multivitamins with vitamin a [ascorbic acid,ergocalciferol,folic acid,nicotinamide,panthenol,retinol,rib oflavin,thiamine hydrochloride] (c - n/a - n/a - n/a) Retin-a [tretinoin] (s - acne - 01/07/1996 - n/a) Retin-a [tretinoin] (s - acne - 01/07/1997 - n/a) Retin-a [tretinoin] (s - scar - 01/07/1996 - n/a)	<b>Drug exposure during pregnancy,</b> Fatigue, Gastric disorder, Insomnia, Irrita bility, Joint pain, Migraine, Miscarriage
1939739	Only HCP	1997/FR	20/F	1 concomitant drug [generic component(s) unknown(qi)] (c - n/a - n/a - n/a) Diane 35 [cyproterone] (c - contraception - n/a - n/a) Diane 35 [ethinylestradiol] (c - contraception - n/a - n/a) Eclaran[benzoyl peroxide] (c - n/a - n/a - n/a) Eryfluid [erythromycin] (c - n/a - n/a - n/a) Roaccutane gel [isotretinoin] (s - acne - 15/04/1994 - n/a) Roaccutane [isotretinoin] (s - acne - 15/01/1993 - n/a) Roaccutane [isotretinoin] (s - acne -	Influenza like illness, Allergic reaction, Headache, Quincke's oedema, Insomnia, Back pain, Myalgia, Mycoplasma infection

Safety Report ID	Primary Group Qualific ation	Year and country	Age/ Gender	Drug list	Reaction List
				15/03/1994 - 3 d) Roaccutane [isotretinoin] (s - acne - 15/10/1993 - n/a) Roaccutane [isotretinoin] (s - acne - 15/11/1993 - 5 d)	
1962197	Patient + Others (HCP / Legal)	1998/US	29/F	Accutane capsules [isotretinoin] (s - acne - 01/07/1983 - 60 d) Accutane capsules [isotretinoin] (s - acne - 01/07/1992 - 152 d) Accutane capsules [isotretinoin] (s - acne - 15/03/1997 - n/a) Accutane capsules [isotretinoin] (s - acne - 15/10/1997 - n/a) Retin a [tretinoin] (s - scar - 02/11/1997 - n/a) Retin a [tretinoin] (s - scar - 22/01/1998 - n/a) Vitamin a [retinoi] (c - n/a - 24/12/1997 - n/a) Vitamin b [vitamin b complex] (c - n/a - 24/12/1997 - n/a) Vitamin e [vitamin e] (c - n/a - 24/12/1997 - n/a)	Anxiety, Diabetes, Dizziness, Exhaustion, Fainting, Fever, Headache, Hyperactivity, Hypoglycaemia, Insomnia, Menstrual disorder NOS, Nausea, Nosebleed, Panicattack, Seizure, Shaking
1978608	Only Patient	2006/CH	?/M	Roaccutan [isotretinoin] (s - acne - n/a - n/a) Roaccutan [isotretinoin] (s - acne - n/a - n/a)	Suicide
2119233	Patient + Others (HCP / Legal)	2000/US	51/F	Anti-depressant (c - depression - n/a - n/a) Cortaid [hydrocortisone a cetate] (c - n/a - n/a - n/a) Renova [tretinoin] (s - ephelides - n/a - n/a) Renova [tretinoin] (s - therapeutic skin care topical - n/a - n/a)	disorder, Sores lip, Abnormal physical sensation, Epstein-Barr virus infection, Injury to teeth, Migraine, Pain, Swallowing difficult, Bacterial infection, Dry eyes, Lung disorder, Paranoid
2306161	Only HCP	2008/US	?/?	Cleocin (c - acne - 26/02/2008 - n/a) Doxycycline (c - acne - 15/04/2008 - n/a) Isotretinoin (s - product used for unknown indication - 29/05/2008 - 15 d) Isotretinoin (s - n/a - 07/08/2007 - 204 d) Minocycline (c - acne - 12/06/2008 - n/a) Retin-a (s - acne - 26/02/2008 - n/a)	Depression, <b>Pregnancy</b> , Treatment noncompliance
3380927	Only HCP	2009/CA	16/M	Clindoxyl [benzoyl peroxide, clindamycin phosphate] (c - acne - n/a - n/a) Differin xp [adapalene] (s - n/a - 01/07/2008 - n/a)	Attention concentration difficulty, Altered mood, Anxiety, Sleep disturbance, Depressed state
3614338	Only Patient	2007/BR	38/F	Glycerin [glycerin] (c - n/a - n/a - n/a) Isotrex cream [isotretinoin] (s - pigmentation disorder - 18/01/2007 - n/a) Sundown [octinoxate, octyl salicylate,	Depression, Erythema, Burning sensation, Swelling, Candidiasis

Safety Report ID	Primary Group Qualific ation	Year and country	Age/ Gender	Drug list	Reaction List
				oxybenzone, titanium dioxide] (c - n/a - n/a - n/a)	
3614615	Only HCP	1999/UK	15/F	Isotrexin [erythromycin, isotretinoin] (s - acne - 28/09/1998 - 42 d)	Depression, Emotional instability
3856429	Only HCP	2010/US	?/F	Differin [adapalene] (s - acne - 14/10/2001 - n/a)	Depression
4515496	Only HCP	1994/US	39/F	Cyclobenzaprine hydrochloride [cyclobenzaprine hydrochloride] (s - product used for unknown indication - n/a - n/a) Doxepin hydrochloride [doxepin hydrochloride] (s - product used for unknown indication - n/a - n/a) Retin-a [tretinoin] (s - acne - 01/07/1993 - n/a) Retin-a [tretinoin] (s - acne - n/a - n/a)	Ataxia, Itching, Excoriation, Anxiety, Headache, Memory loss, Toxic encephalopathy, Depression worsened, Dysarthria, Hepatitis, Intentional misuse, Overdose
5421790	Only HCP	2005/US	75/M	Solage (s - skin hyperpigmentation - 15/02/2004 - n/a)	Emotional disturbance NOS, Vitiligo
6285859	Only Patient	2013/AU	14/M	Epiduo [adapalene 0.1% / benzoyl peroxide 2.5% gel, adapalene, benzoyl peroxide] (s - acne - n/a - n/a)	Chemical burn, Expressive language disorder, Difficulty breathing, Blister, Swelling face, Eating disorder
6315754	Only HCP	2013/NL	19/F	Tretinoine creme 0,2mg/g [tretinoine] (s - acne - 01/07/2012 - n/a)	Psychic disturbance
6473415	Only Patient	2011/CA	?/F	Differin [adapalene] (s - n/a - 15/08/2009 - n/a) Differin [adapalene] (s - n/a - 15/09/2008 - n/a)	Rash NOS, Rash papular, Nausea, Depression, Stress, Dry skin, Redness, Skin irritation, Hair loss, Acne aggravated, Skin burning sensation, Skin scarring, Skin infection NOS, Dizziness, Bruising, Yeast infection, Gingival hyperpigmentation
7149547	Only HCP	2010/FR	28/M	Curacne [isotretinoin] (s - acne - 15/11/2008 - n/a) Zyprexa [olanzapine] (c - schizophrenia - n/a - n/a)	Suicide
7585894	Only Patient	2013/US	34/M	Ziana [clindamycin phosphate, tretinoin] (s - acne - 15/02/2013 - n/a)	Suicidal ideation, Rosacea
8396104	Only Patient	2014/US	41/F	Benzoyl peroxide/clindamycin [benzoyl peroxide, clindamycin] (s - rosacea - 08/05/2014 - n/a) Tretinoin [liposomal tretinoin, tretinoin] (s - rosacea - 08/05/2014 - n/a) Tretinoin [liposomal tretinoin, tretinoin] (s - scar - 08/05/2014 - n/a) Finacea [azelaic acid] (c - n/a - n/a - n/a) Hydroquinone [hydroquinone] (c - n/a - n/a - n/a)	Difficulty sleeping, Skin discoloration, Application site exfoliation, Itching, Allergicreaction, Rash, Eyes swollen, Skin rough, Face red, Facial swelling, Application site burning, Off label use, Sun sensitivity
9192082	Only Patient	2015/SE	20/F	Epiduo [adapalene, benzoyl peroxide] (s - acne - 01/01/2015 - n/a)	Dry skin, Sleep disorder, Erythema, Chemical burn, Pain of skin, Skin hyperpigmentation, Itching, Flaking skin, Allergiccontact dermatitis
9433933	Only HCP	2015/UK	?/F	Roaccutane [isotretinoin] (s - acne - n/a - n/a)	Sleep disturbance
9667248	Only Patient	2015/US	13/F	Epiduo (adapalene, benzoyl peroxide) gel 0.1% / 2.5% [adapalene, benzoyl peroxide] (s - acne - 19/07/2015 - n/a) Epiduo (adapalene, benzoyl peroxide) gel 0.1% / 2.5% [adapalene, benzoyl peroxide] (s - n/a - n/a - n/a) Minocycline [minocycline] (c - acne - n/a - 240 d) Preprepared face cloths from cvs(qi) (c - therapeutic skin care topical - n/a - 365 d)	Breathing difficult, Allergic reaction, Stomach pain, Accidental ingestion of drug, Itching mouth, Itching all over, Urticaria, Burning mouth, Itchy throat, Anxiety attack, Lip swelling
9797865	Only HCP	2015/US	54/F	Interleukin-2 [aldesleukin] (s - metastatic malignant melanoma -	Depression worsened, Nausea, Malignant neoplasm progression,

Safety Report ID	Primary Group Qualific ation	Year and country	Age/ Gender	Drug list	Reaction List
				15/07/2014 - 7 d) [imiquimod] (s - metastatic malignant melanoma - n/a - n/a) [tazarotene] (s - metastatic malignant melanoma - n/a - n/a)	Metastatic melanoma
10072749	Patient + Others (HCP / Legal)	2015/US	?/F	Aczone [dapsone] (s - product used for unknown indication - 15/06/2015 - n/a) Tazorac cream 0.1% [tazarotene] (s - product used for unknown indication - 15/06/2015 - n/a)	Feeling of despair, Suicidal ideation
10515180	Only HCP	2016/US	?/F	Epiduo (adapalene, benzoyl peroxide) gel 0.1% / 2.5% [adapalene, benzoyl peroxide] (s - n/a - n/a - 30 d)	Eating disorder, Pain of skin, Swelling face, Cellulitis of face

# 7.4. Subgrouping by self-injury-specific mortality

There are 373 case reports of self-injury-specific mortality as per the definition used in 6.1.2. the vast majority of which are to isotretinoin.

**Table 16: Distribution of case reports of self-injury-specific mortality per International Non-proprietary Nomenclature.** Rows should not be summed as individual case reports may have coded more than one substance.

INN	Count Cases
Acitretin	4
Adapalene	0
Alitretionin	3
Bexarotene	0
Isotretinoin	367
Tazarotene	0
Tretinoin	0

As can be seen in Figure 3, the count of case reports has been reducing since 2012, however the proportion of self-injury-specific mortality within the Psychiatric SOC has been reasonably stable as a result of an overall reduction in the total number of case reports.

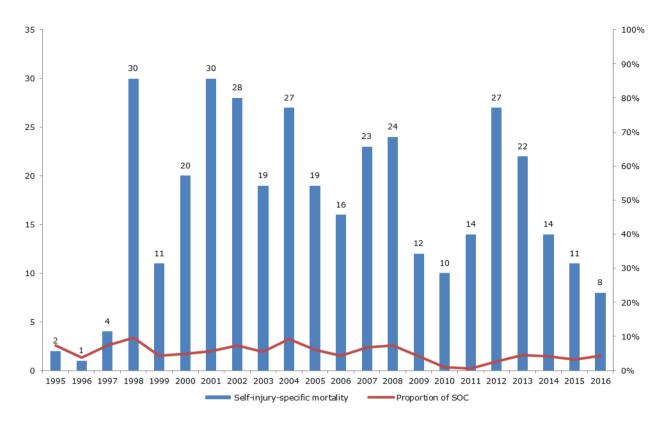


Figure 3: Distribution of case reports of self-injury-specific mortality per receive year (01/01/1995 - 19/07/2016).

Whereas in the age distribution of psychiatric disorders the count of cases by gender was higher for males only until the age of 30-34, in the self-injury-specific mortality case reports, the frequency of reports was higher for males in all age groups up to 60 (highest for males in the age group 15-24).

Table 17: Distribution of case reports of self-injury-specific mortality by age group (5-year intervals) and gender.

Age Year	Female	Male	Not Specified
0-4			
5-9			
10-14	5	9	
15-19	19	109	1
20-24	15	88	2
25-29	14	20	
30-34	6	9	
35-39	3	5	
40-44	2	3	
45-49		2	
50-54	1	2	
55-59			
60-64	1	1	
65-69	1		
70-74			

Age Year	Female	Male	Not Specified
75-79			
80-84			
85+			
N/A	4	40	11

The highest number of case reports for self-injury specific mortality is from the United States, though the proportion of the mortality cases from this country is much reduced as compared to the proportion for Psychiatric disorders.

Table 18: Distribution of case reports of self-injury-specific mortality by primary source country (top 15 most frequent).

Primary Source Country	Count Cases
United States	146
United Kingdom	67
France	43
Australia	25
Canada	13
Switzerland	12
Germany	10
Brazil	9
Sweden	8
New Zealand	7
Finland	4
Iran	4
Denmark	3
Belgium	2
Colombia	2

Within the subgroup of self-injury-specific mortality, 43 case reports (12%) have medical history of any form of depression, anxiety, suicidal ideation and suicide attempt (Table 10).

**Table 19: Distribution of case reports by medical history of depression, anxiety and suicide attempt or ideation.** Rows should not be summed as individual case reports may have coded more than one medical history.

Medical history	Count Cases
Depression	35
Anxiety	8
Suicidal ideation	7
Suicide attempt	3

# 8. Appendix I – INN and Scientific Composition (High Level)

INN	Scientific Composition (High Level)	Count Cases
Acitretin	ACITRETIN	123
Adapalene	ADAPALENE	5
	ADAPALENE, BENZOYL PEROXIDE	5
Alitretinoin	ALITRETINOIN	225
Bexarotene	BEXAROTENE	14
Isotretinoin	ERYTHROMYCIN, ISOTRETINOIN	2
	ISOTRETINOIN	9,864
Tazarotene	TAZAROTENE	2
Tretinoin	CLINDAMYCIN PHOSPHATE, TRETINOIN	1
	ERYTHROMYCIN, TRETINOIN	1
	MEQUINOL, TRETINOIN	1
	TRETINOIN	56

# 9. Appendix II - Group of indications

Group of indications	Indication PT
Acneiformeruptions	Acne
	Acne conglobata
	Acne cystic
	Acne fulminans
	Acne infantile
	Acne pustular
	Acne varioliformis Oil acne
	Rosacea
Conditions of the skin appendages	Alopecia scarring
	Folliculitis
	Hidradenitis
	Keratosis follicular
Dermatitis	Dermatitis
	Dermatitis acneiform
	Dermatitis allergic
	Dermatitis atopic Dermatitis contact
	Dermatitis papillaris capillitii
	Hand dermatitis
	Seborrhoeic dermatitis
Eczema	Dyshidroticeczema
	Eczema
	Eczema asteatotic
Lichenoideruptions	Lichen planus
	Lichen sclerosus Neurodermatitis
	Pityriasis lichenoides et varioliformis acuta
Lymphoid-related cutaneous conditions	Acute lymphocyticleukaemia
Lymphora related cutaffeods conditions	Acute myeloid leukaemia
	Acute promyelocytic leukaemia
	Lymphocytic infiltration
	Lymphoma
	Mycosis fungoides
Other non-skin conditions	Chronic hepatitis C
	Depression
	Emphysema  Footal expecting programmy
	Foetal exposure during pregnancy Hepatitis C
	Keratitis
	Muscle spasticity
	Retinal detachment
Other skin conditions	Cellulitis
	Cheilitis granulomatosa
	Cutaneous lupus erythematosus
	Cyst
	Dermal cyst Dermatomyositis
	Dermatosis
	Ephelides
	Face oedema
	Furuncle
	Hyperkeratosis
	Ichthyosis
	Keratoacanthoma
	Mucosal inflammation
	Nodule Palmar-plantar erythrodysaesthesia syndrome
	Papule
	Pigmentation disorder
	Pityriasisrosea
	Pityriasisrubra pilaris
	Pruritus
	Pulpitis dental
	Rash
	Rash papular
	Rash pustular

Group of indications	Indication PT
	Scar
	Scleroderma
	Sebaceous gland disorder
	Sebaceous glands overactivity
	Sebaceous hyperplasia Sebaceous hyperplasia
	Seborrhoea
	Skin disorder
	Skin dystrophy
	Skin hyperpigmentation
	Skin lesion
	Skin mass
	Skin papilloma
	Skin reaction
	Skin ulcer
	Subcutaneous abscess
	Therapeutic skin care topical
	Thermalburn
	Urticaria
Other types of neoplasm	Atypical teratoid/rhabdoid tumour of CNS
	Brain neoplasm
	Brain neoplasm malignant
	Lung neoplasm malignant
	Neoplasmmalignant
	Neuroblastoma
	Non-small cell lung cancer
	Pinealoblastoma
	Renal cancer
Psoriasis	Psoriasis
	Pustular psoriasis
Skin neoplasms	Basal cell carcinoma
	Lip and/or oral cavity cancer
	Metastatic malignant melanoma
	Skin cancer metastatic
	Squamous cell carcinoma
Unknown indication	Off label use
	Product used for unknown indication
	Unevaluable event