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| NICE Health Technology Appraisal - 2nd ACD on Denosumab for Bone Metastases from Solid Tumours | |
| TO: NICE | FROM: Healthcare Improvement Scotland |
| 05 July 2012 | |

**Comments provided to Healthcare Improvement Scotland by Dr David Dodds,
Consultant Oncologist**

The clinical and cost effectiveness summaries are all reasonable and fully applicable to NHS Scotland, having considered the relevant evidence. The provisional recommendations are a suitable basis for guidance for the NHS and the pathways and treatment options are again applicable to NHS Scotland.

However, with regard to Prostate Cancer there is one salient point. The recommendations as stated do not approve the use of Denosumab as it is argued that the most relevant comparator is best supportive care, rather than Zoledronic Acid. In NHS Scotland we do have limited availability of Zoledronic Acid in some areas although it is not approved by SMC. There is some allowance for pain control of Zoledronic Acid by NICE but this is not explicitly stated for Denosumab. It might be argued that the best comparator for Denosumab in Scotland is Zoledronic Acid by virtue of the fact that limited availability exists.

**Comments provided to Healthcare Improvement Scotland by [REDACTED],
Consultant Oncologist**

I consider that all relevant evidence has been taken into account, that the summaries of clinical and cost effectiveness are reasonable interpretations of the evidence and that the provisional recommendations of the Appraisal Committee are sound and constitute a suitable basis for the preparation of guidance to the NHS.