National Institute for Health and Care Excellence

Single Technology Appraisal (STA)

NBTXR-3 for treating soft tissue sarcoma

Response to consultee and commentator comments on the draft remit and draft scope (pre-referral)

Please note: Comments received in the course of consultations carried out by NICE are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the submissions that NICE has received, and are not endorsed by NICE, its officers or advisory committees.

Comment 1: the draft remit

| Section | Consultee/ Commentator | Comments [sic] | Action |
|--|---------------------------|--|--|
| Appropriateness | Sarcoma UK | Yes | Comment noted |
| Wording | Sarcoma UK | Wording of the technology section incorrect see below | Thank you this has now been corrected to 'NBTXR-3 does not currently have a CE mark for treating soft tissue sarcoma.' |
| Timing issues | Sarcoma UK | There are limited options available for sarcoma patients, this has real potential to enhance existing limited standard treatments and improve outcomes for our patients. | Comment noted. |
| Additional comments on the draft remit | | No additional comments received | |

Comment 2: the draft scope

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| Section | Consultee/ Commentator | Comments [sic] | Action |
|---------------------------------|---------------------------|--|---|
| Background information | Sarcoma UK | It would be clearer to say 'The tumour is removed with a margin of normal tissue with the aim of removing all cancer cells and lowering the chance of <i>local</i> relapse. | Thank you for this comment. The scope has been updated to state "with the aim of removing all cancer cells and lowering the chance of local relapse". |
| The technology/ intervention | Sarcoma UK | 'NBTXR-3 does not currently have a CE mark for treating soft <i>tissue</i> sarcoma' | Thank you, this has been corrected in the scope. |
| Population | Sarcoma UK | This is currently unclear and needs further clarification: Are there any age restrictions? Will it be available for example to the TYA community? Does the treatment only apply to certain sub- types? Will it only be available in certain centres or will all units currently providing sarcoma RT have access? For example could patients in Cornwall have access to NBTXR-3? | Comment noted. The technology will be appraised for the population as stipulated in the CE marked indications for use. Availability to the teenage and young adult community (TYA) will be dependent on the eligibility criteria in the CE marking. |
| | | | If NBTXR-3 is recommended by NICE NHS England will be mandated to provide |

| Section | Consultee/ Commentator | Comments [sic] | Action |
|-------------|---------------------------|--|--|
| | | | funding and access to this technology. |
| Comparators | Sarcoma UK | Radiotherapy – further clarity Will the comparison be made to pre op RT 55gy alone or will it look at post op RT 66gy which is often used to achieve the same outcome. Post RT is more labour intensive for patients and has added costs because of more visits. In some centres it remains the standard treatment. Neoadjuvant chemotherapy – is occasionally used for some sub types. | Comment noted. In the clinical trials NBTXR-3 was used preoperatively. NBTXR-3 will be appraised within its CE marked indication and the radiotherapy dosage it is used with will be determined during the appraisal. It is unclear whether NBTXR-3 can be used in people receiving chemotherapy in addition to radiotherapy and chemotherapy has not been added as a comparator in the scope, but it is noted that there may be some people who receive chemotherapy in clinical |
| Outcomes | Sarcoma UK | Would the necrosis rate be considered? Would local recurrence rate be measured? | Comments noted. It is anticipated that wound |

National Institute for Health and Care Excellence

| Section | Consultee/ Commentator | Comments [sic] | Action |
|---------|---------------------------|---|--|
| | | Did the neoadjuvant treatment allow the patient to have surgery that was not possible before? Patients have real issues with wound infection with pre op RT, this can have a real impact on their quality of life, will this measured? Is there any increase in lymphedema a significant longer term side effect? | infection and side effects would be considered as part of adverse effects of treatment, which is listed as an outcome in the scope. It is further anticipated that local recurrence rate would be covered by the outcome relapse rate and that necrosis rate would be covered by the outcome response rate. Likelihood of surgery was not added as an outcome because it is anticipated that radiotherapy (with or without NBTXR-3) would be initiated in people for whom surgery would be carried out after treatment. Success of surgery would be captured by relapse rate. |

| Section | Consultee/ Commentator | Comments [sic] | Action |
|----------------------------|---------------------------|---|--|
| Economic analysis | | No comments on economic analysis were received | |
| Equality and Diversity | Sarcoma UK | There needs to be regional access, our understanding is the injection seems to be given the day before the 5 weeks of daily treatment starts. A clear practical understanding of how NBTXR-3 is given, specifically the timings might help understand if patients could go to a larger centres further away for the injection and go back regionally for the 5 weeks of treatment. | Comment noted. Should NBTXR-3 be recommended by NICE the implementation of the guidance will be considered by NHS England. |
| Other considerations | | No comments on economic analysis were received | |
| Innovation | Sarcoma UK | We consider the technology to be innovative with the potential to be a step change in the neoadjuvant setting for sarcoma. It is not possible to comment on the likelihood of the impact on health related benefits without seeing data. Phase 3 trial has just finished accrual, results not available until 2019. Phase 1 data – Bonvalot, S <i>etal</i> <u>Clin Cancer Res.</u> 2017 Feb 15;23(4):908-917. doi: 10.1158/1078-0432.CCR-16-1297. Epub 2016 Oct 6. | Comment noted |
| Questions for consultation | | No comments received on questions for consideration | |

National Institute for Health and Care Excellence

| Section | Consultee/ Commentator | Comments [sic] | Action |
|--|---------------------------|--|--------|
| Additional comments on the draft scope | | No additional comments on the draft scope received | |

The following consultees/commentators indicated that they had no comments on the draft remit and/or the draft scope

None