

To the: emlsecretariat@who.int

WHO Expert Committee on Selection and Use of Essential Medicines

RE: Application reference: A.19 Methylphenidate – attention deficit hyperactivity disorder

Dear Members of the Essential Medicines for Children Committee,

The purpose of this letter is to strongly support the inclusion of methylphenidate in the WHO Model List of Essential Medicines for the treatment of children and adolescents between the ages of 6 and 17 years with Attention-Deficit/Hyperactivity Disorder (ADHD), as well as for the corresponding application "A.19 Methylphenidate – attention deficit hyperactivity disorder."

Essential medicines are those that satisfy the priority health care needs of a population. They are selected with due regard to disease prevalence and public health relevance, evidence of efficacy and safety and comparative cost-effectiveness. They are intended to be available in functioning health systems at all times, in appropriate dosage forms, of assured quality and at prices individuals and health systems can afford.

Methylphenidate, which has been used as a first line treatment for ADHD in children and adolescents for more than 40 years in many countries¹, meets all criteria listed above for inclusion in the list. To summarize this shortly:

1. ADHD is a common neurodevelopmental condition with an estimated world-wide prevalence of 5% to 7% in children and adolescents², with over 50% of them benefiting from methylphenidate³
⁴. Although most studies are from North America and Europe, ADHD has been recognised and studied across all continents, including South America, Africa, Asia, Middle East, and Oceania⁵. It is associated with substantive burden for the affected children, their families and society. These include increased risk for poor academic and school performance, school drop-out, unemployment, poor physical health, initiation of smoking and substance use/misuse, and co-occurrence of oppositional and antisocial behaviour, suicidality and mood/anxiety problems⁶.
2. There is abundant evidence that methylphenidate is effective in lowering symptom severity⁷, reducing risk for negative adverse consequences and complications (i.e., protecting against substance use, suicidality, school drop-out, and later mood disorder/anxiety⁸). Placebo-controlled discontinuation studies have demonstrated long-term efficacy over a period of at least 2 years⁹.
3. There is clear evidence that methylphenidate is significantly more effective than a whole variety of non-pharmacological interventions, such as behaviour therapy, diet and lifestyle interventions, and neurofeedback¹⁰.
4. There is clear evidence that methylphenidate treatment is safe, without alarming and life-threatening short and long term side effects and has good tolerability¹¹.
5. Given the above, methylphenidate medication is a recommended treatment option in all authoritative international guidelines for ADHD, such as those by NICE (UK), SIGN (Scotland), CADDRA (Canada), AACAP (USA), AADPA (Australia), and by guidelines in many other countries including Germany, Hungary, India, Brazil, Japan, Netherlands, and the Scandinavian countries.

We write this letter on behalf of the European Network for ADHD (EUNETHYDIS)¹ and the European ADHD Guidelines Group (EAGG). EUNETHYDIS is a network of 130 experts in ADHD, founded about 40 years ago that aims to facilitate high-quality research on ADHD and its broader societal impact through collaboration between clinical and basic science researchers across Europe in the spirit of openness, trust, and support. While the network is based in Europe, it embraces a global perspective. Over the past four decades, EUNETHYDIS has been instrumental in supporting research studies on the treatment of ADHD, including pharmacological interventions.

In 2010, EUNETHYDIS formally established the European ADHD Guidelines Group (EAGG)², a group of 29 clinicians and researchers aimed at rigorously appraising the literature and providing evidence-based guidance for daily clinical questions in ADHD practice. The EAGG published a landmark network meta-analysis of 133 randomized controlled trials of ADHD medications, showing a high effect size (around 0.80) on ADHD core symptom severity and similar tolerability to placebo for methylphenidate⁷. Both pharmaceutical company-sponsored and non-pharmaceutical company-sponsored RCTs [such as the MTA study¹² or a large (N ~ 500) Canadian RCT¹³] show beneficial effects of methylphenidate and generally good tolerability.

Notably, the EAGG has also conducted a series of meta-analyses on non-pharmacological interventions, including behavioural interventions, cognitive training, neurofeedback, and dietary interventions, showing that their value in treating the core symptoms of ADHD remains uncertain¹⁴⁻¹⁷, although they may be beneficial for important comorbid conditions (e.g., oppositional defiant disorder, in the case of behavioral interventions¹⁸).

EUNETHYDIS has also been closely involved in the development and delivery of the Attention-Deficit Hyperactivity Disorder Drugs Use Chronic Effects (ADDUCE) consortium³. This network of 16 universities across Europe, funded by the European Research Agency, conducted the largest naturalistic controlled study worldwide to investigate the safety of methylphenidate over a two-year period. The ADDUCE study¹⁹ showed that long-term treatment with methylphenidate is safe, with no evidence to support the hypothesis that it leads to reductions in growth. Although methylphenidate-related pulse and blood pressure changes were relatively small, they require regular monitoring, as per current guidelines and good clinical practice.

We understand that, while most researchers and clinicians in the field acknowledge the benefits of methylphenidate and its overall good tolerability, a minority is concerned around quality of evidence of randomised controlled trials and the lack of randomised controlled trials in the longer term (after 1 year). The assessment of quality of evidence is based on tools involving subjective decisions which may introduce bias (including ideological bias). In our network meta-analysis⁷, the overall quality of the evidence using the rigorous GRADE framework and adopting a conservative approach was deemed as moderate - high in 5 domains and moderate in 1 domain. Regarding the supposed lack of long-term evidence, while it is unethical to conduct long-term randomised trials when methylphenidate has already been shown to be superior to other treatments, we would like to emphasize that trials using the discontinuation design demonstrate the persistence of methylphenidate's benefits over time^{9 20}.

While some critics have tended to focus solely on evidence from randomised controlled clinical trials, we believe that this narrow focus is unwarranted, especially given the poor representativeness of trial participants. Indeed, there is evidence that around 50% of individuals with ADHD would not be recruited for clinical trials²¹. In contrast, evidence from studies designed to provide insights into cause-and-effect relationships has shown remarkable overall benefits of methylphenidate. Studies using the within individual design have demonstrated reductions in physical injuries, motor vehicle accidents,

¹ <https://eunethydis.eu/>

² <https://eunethydis.eu/eunethydis-initiatives/european-adhd-guideline-group/>

³ <https://cordis.europa.eu/project/id/260576/reporting>

depression, and criminal acts, as well as improvements in academic function⁸. Rigorous evidence from target trial emulation design shows a reduction in mortality with stimulant (including methylphenidate) treatment²².

Methylphenidate is only one component of the multimodal management of individuals with ADHD, which must include non-pharmacological approaches as well. Some individuals may not benefit from or tolerate methylphenidate, but most individuals with ADHD will benefit from and tolerate it well. This is in line with the views expressed by many individuals with lived experience of ADHD, who have collaborated/interacted with EUNETHYDIS over the years.

In conclusion, we deem that many countries around the world - including low- and middle-income countries, where the prevalence of ADHD (when rigorously assessed) has been shown to be similar to that in so-called developed countries² - will benefit from the inclusion of methylphenidate in the EML.

Sincerely,

Professor Samuele Cortese, MD, PhD

Chair EAGG

A handwritten signature in dark ink, reading "Samuele Cortese" in a cursive script.

Professor Jan Buitelaar, MD, PhD

Co-Chair EAGG

A handwritten signature in dark ink, consisting of a stylized, abstract representation of the name "Jan Buitelaar".

Professor Sven Bölte, PhD

Co-Chair of EUNETHYDIS

A handwritten signature in dark ink, reading "Sven Bölte" in a cursive script.

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