
Agentic Construction of EPAR-Structured Toxicity Dossiers: Split Evaluation and a Rapamycin Case Study

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Abstract

1 We build an AI-driven system that compiles medicine safety dossiers in the struc-
2 ture of the European Public Assessment Report (EPAR)—the format regulators
3 use to document benefits and risks. We focus on the “Undesirable effects” sec-
4 tion (§4.8) and use sirolimus (rapamycin) as a case study. To judge quality, we
5 compare the system’s side-effect list to the official patient leaflet by matching
6 each side-effect term one-to-one and checking whether the attached study citation
7 is correct. On sirolimus, our approach covers more of the leaflet’s terms than a
8 strong web-enabled baseline while keeping good citation accuracy. We release ta-
9 bles, figures, and a simple recipe so others can repeat the evaluation on their own
10 agents.

11 1 Introduction

12 **Why this matters.** Clinicians rely on the prescriber label (*Summary of Product Characteristics*,
13 *SmPC*), patients on the *Patient Information Leaflet (PIL)*, and the public on the *European Public*
14 *Assessment Report (EPAR)* for transparent benefit–risk information. These sources evolve, and syn-
15 thesizing them manually is slow and error-prone.

16 **One-sentence idea.** Use an AI system to gather, cross-check, and organize safety information
17 directly into an EPAR-like dossier, with emphasis on §4.8 (side effects).

18 **What is new.** (i) *Structured from the start*: the agent writes into a regulator-style layout so outputs
19 are easy to navigate and *comparable across drugs*. (ii) *Testable against ground truth*: we judge the
20 side-effects section against the official leaflet’s preferred terms. (iii) *One claim = one side effect*:
21 we split sentences so each claim contains exactly one side-effect term for unambiguous scoring. (iv)
22 *Source-aware*: we verify whether attached study citations are correct.

23 Glossary (plain language)

24 **EPAR**: European Public Assessment Report (regulator’s public assessment).

25 **SmPC**: Summary of Product Characteristics (prescriber label).

26 **Side effects** (“Undesirable effects”): unwanted effects while taking a medicine.

27 **Preferred term**: standardized side-effect name (e.g., “stomatitis”).

28 **SOC**: System Organ Class (body-system category, e.g., *Blood and Lymphatic System Disorders*).

29 **2 System and Pipeline (Progress Report)**

30 **EPAR structure as blueprint.** The EPAR/SmPC schema defines how safety information is or-
31 ganized across quality, non-clinical toxicology, and clinical safety [1]. Writing directly into this
32 schema makes outputs navigable and comparable across drugs.

33 **Dossier content.** Scope covers mechanism-of-action (safety-relevant), preclinical toxicology,
34 clinical side effects, warnings/contraindications, and risk management.

35 **Data acquisition.** Programmatic access to EMA (EPAR/SmPC) [1], FDA labeling and FAERS
36 [2], plus public repositories; OCR is used if needed.

37 **Multi-source integration.** We integrate SIDER, TOXRIC, and FAERS alongside peer-reviewed
38 literature [2–4]. Terminology is harmonized and mapped to SOCs.

39 **Automated updates.** Scheduled refresh, normalization and merge; a simple website reflects up-
40 dates automatically.

41 **Benchmarking vs. leaflets.** We benchmark §4.8 coverage against official leaflets with versioning.

42 **3 Methods**

43 **Ground truth.** Leaflet §4.8 preferred terms with their SOC and frequency bands serve as ground
44 truth. Leaflet preferred terms align with MedDRA Preferred Terms (PT) [5].

45 **Producing the dossier sections (§4.1 and §4.8).** *§4.1 Therapeutic Indications* is derived from
46 pivotal trials and consensus guidance; we cross-check scope and population against SmPC/EPAR
47 wording for consistency [1]. *§4.8 Undesirable Effects* is built by (i) splitting generated text so
48 each row contains one side-effect term; (ii) mapping to MedDRA PT and SOC [5]; (iii) verifying
49 citations (DOI/PMID); and (iv) quality checks for duplicates, wrong SOCs, and unverifiable sources.
50 Auxiliary evidence bases include SIDER, FAERS, and TOXRIC [2–4].

51 **Split matching and metrics.** A claim is counted as covered if it contains the leaflet preferred
52 term (case-insensitive) within the correct SOC. We report: (i) term coverage, (ii) SOC macro cov-
53 erage (macro-average of per-SOC recall), (iii) frequency-weighted coverage (weights from leaflet
54 frequency bands), and (iv) citation accuracy on sourced rows. 95% CIs for proportions use Wil-
55 son/Newcombe intervals [6]; macro/weighted coverage CIs use a nonparametric bootstrap [7].

56 **Baseline.** A general-purpose, web-enabled LLM prompted to “search and compile side effects
57 of a specific substance (e.g., sirolimus)” without EPAR schema enforcement, SOC mapping, split
58 normalization, or DOI verification.

59 **Contributions**

60 **EPAR-aligned safety dossiers:** an AI system that writes directly into a regulator-style structure.

61 **Transparent scoring:** split-based evaluation where each claim maps to exactly one side-effect term.

62 **Source checking:** study citations are attached and assessed for correctness.

63 **Reproducible artifacts:** data tables and a simple recipe to re-run the evaluation on other agents and
64 drugs.

65 **4 Results**

66 **Overview.** We report coverage and citation results for §4.8 on sirolimus. Fig. 1 compares term,
67 SOC macro, and frequency-weighted coverage; Fig. 2 adds 95% CIs and shows citation accuracy
68 (system, sourced rows).

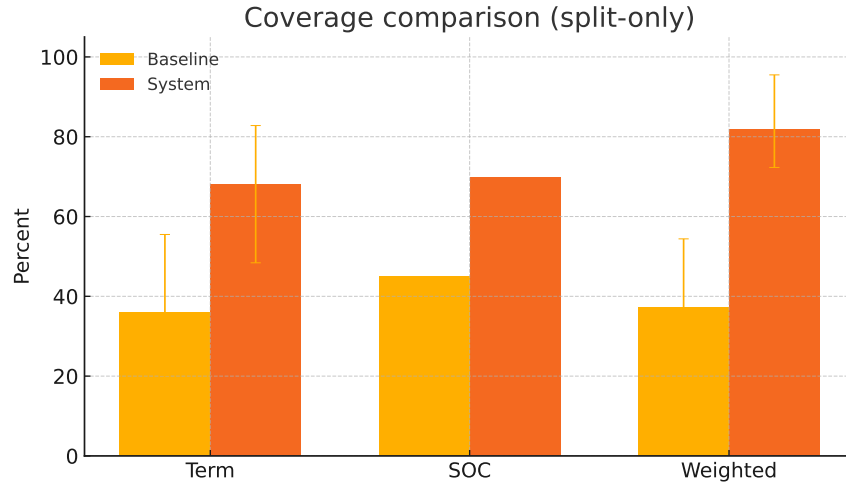


Figure 1: Term, SOC macro, and weighted coverage (§4.8, split-only).

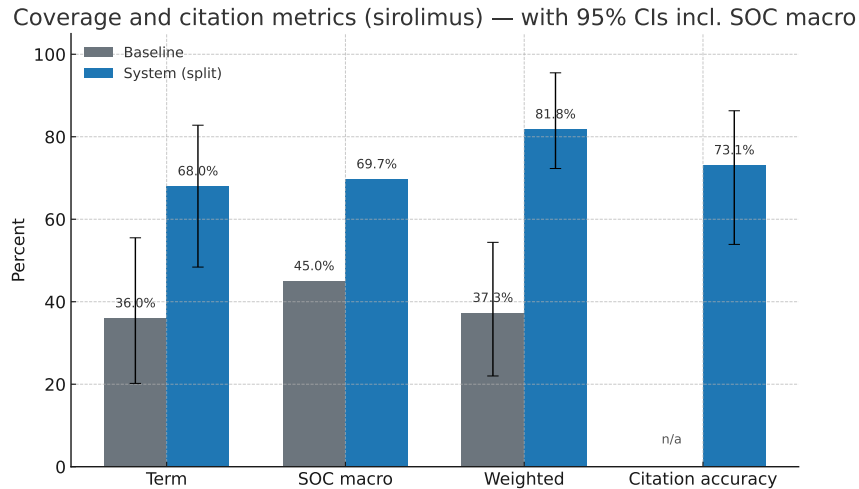


Figure 2: Coverage and citation metrics (sirolimus) with 95% confidence intervals for term, SOC macro (bootstrap), and weighted coverage; citation accuracy shown for the system (sourced rows).

69 **Metrics at a glance.** Term coverage: **68.0%** (95% CI: 48.4–82.8) vs. baseline **36.0%** (20.2–55.5);
 70 SOC macro coverage: **69.7%** vs. baseline **45.0%**; frequency-weighted coverage: **81.8%** (72.3–
 71 95.5) vs. baseline **37.3%** (22.0–54.4); citation accuracy (system, sourced rows): **73.1%** (53.9–86.3).
 72 Per-SOC distributions are in Fig. 3 and Fig. 4.

Table 1: Summary metrics for §4.8 (split-only). Brackets show 95% CIs where applicable.

Metric	Baseline	System
Term coverage (%)	36.0 [20.2, 55.5]	68.0 [48.4, 82.8]
SOC macro coverage (%)	45.0	69.7
Weighted coverage (%)	37.3 [22.0, 54.4]	81.8 [72.3, 95.5]
Citation accuracy (%)	—	73.1 [53.9, 86.3]

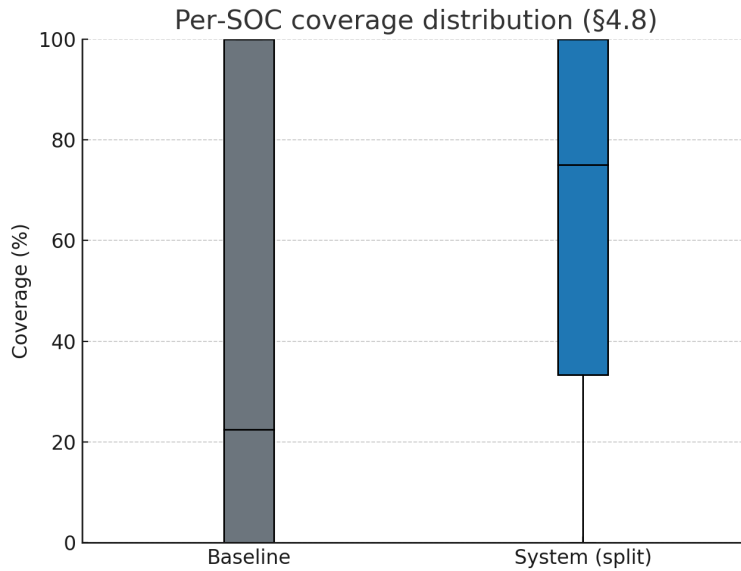


Figure 3: Per-SOC coverage distribution (§4.8). Boxes show median and IQR; whiskers indicate spread; points are outliers.

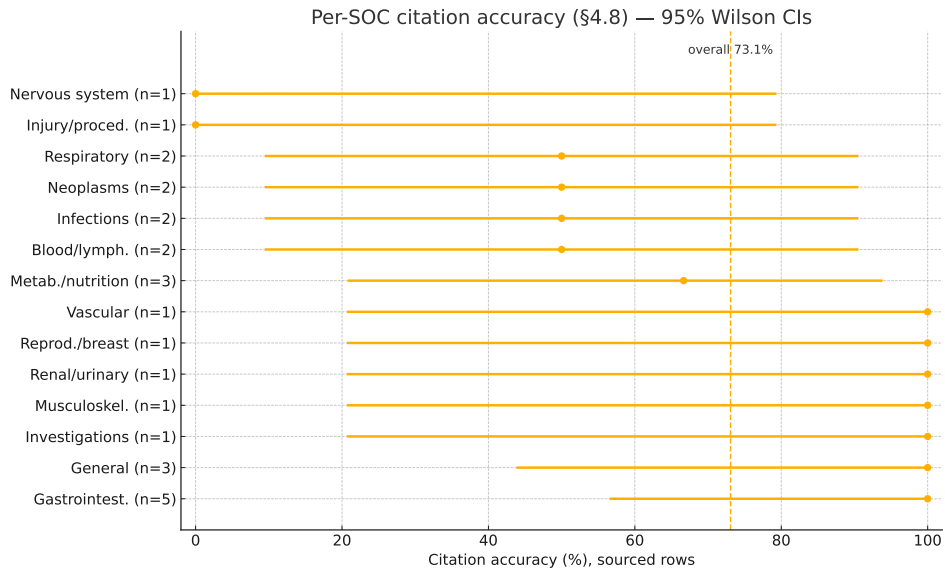


Figure 4: Per-SOC citation accuracy for the system (§4.8, sourced rows only). Points show accuracy; horizontal lines are 95% Wilson confidence intervals [6]; the dashed line indicates overall accuracy.

Table 2: Per-SOC coverage (leaflet §4.8). Percent of leaflet terms covered; Δ is System minus Baseline.

SOC	Baseline (%)	System (%)	Δ (pp)
Blood/lymph.	100.0	100.0	0.0
Gastrointest.	20.0	100.0	80.0
Investigations	100.0	100.0	0.0
Metab./nutrition	100.0	100.0	0.0
Skin/subcut. tissue	0.0	100.0	100.0
Vascular	0.0	100.0	100.0
General	25.0	50.0	25.0
Musculoskel.	50.0	50.0	0.0
Infections	0.0	33.3	33.3
Nervous system	0.0	33.3	33.3

73 5 Discussion

74 **Baseline characterization.** Without EPAR schema enforcement, SOC mapping, split normaliza-
 75 tion, and DOI verification, the baseline yields less structured, less reproducible outputs. Our agent’s
 76 structure and checks likely drive the gains in coverage and the more stable sourcing.

77 **Strengths and limitations.** EPAR-aligned ground truth and split matching reduce undercounting
 78 of multi-term sentences; frequency weighting emphasizes clinically important effects. Limits in-
 79 clude exact-term matching (synonyms are not credited), indirect treatment of frequency, sourcing
 80 measured only on cited rows, and potential lag between labels and databases.

81 **Error examples.** *False negative (FN):* “mouth sores” not matched to PT *stomatitis* (fixed by syn-
 82 onym map). *False positive (FP):* generic “infection” mapped to wrong SOC (fixed by enforcing
 83 leaflet SOC).

84 **Ablation note.** Dropping the split-by-term rule makes matching ambiguous and reduces term cov-
 85 erage in dry runs; structured splitting is a simple but impactful control.

86 6 Case Study: Rapamycin Dossier (EPAR-Aligned)

87 6.1 4.1 Therapeutic Indications

88 Sirolimus (rapamycin) is indicated for prophylaxis of organ rejection in adult kidney-transplant re-
 89 cipients, typically in combination with a calcineurin inhibitor (e.g., cyclosporine) and corticosteroids
 90 [8, 9]. In practice, sirolimus is often started early post-transplant with cyclosporine and steroids;
 91 once stable graft function is achieved, tapering or withdrawal of the calcineurin inhibitor can be
 92 considered, with sirolimus maintenance thereafter [10]. For sporadic lymphangioliomyomatosis
 93 (LAM), sirolimus stabilizes lung function and improves outcomes in adults with abnormal or de-
 94 clining function [11]; contemporary guidance recommends sirolimus as first-line therapy for such
 95 patients [12].

96 6.2 4.8 Undesirable Effects

97 Frequent effects include changes in blood counts (thrombocytopenia, anemia, leukopenia) and raised
 98 blood lipids (hyperlipidemia, hypertriglyceridemia), often requiring monitoring and lipid-lowering
 99 therapy [13, 14]. High blood sugar and new-onset diabetes have been observed in transplant recip-
 100 ients on sirolimus [14, 15]. Dose-related mouth ulcers (stomatitis), skin eruptions, and gastroin-
 101 testinal symptoms such as nausea, diarrhea, constipation, and abdominal pain are common [13, 14].
 102 Hypertension and peripheral edema also occur and may require treatment or dose change [13, 14].
 103 Some effects correlate with higher trough levels and improve with dose reduction; severe or refrac-
 104 tory events—such as intractable stomatitis, non-infectious pneumonitis, or proteinuria—can require
 105 interruption or discontinuation [13–15]. As an immunosuppressant, sirolimus increases susceptibil-
 106 ity to infections; long-term immunosuppression is associated with higher malignancy risk, especially

107 lymphomas and skin cancers [13]. In kidney-transplant recipients with prior cutaneous squamous-
108 cell carcinoma, conversion to sirolimus reduced new skin cancers albeit with higher adverse-event
109 and discontinuation rates [16]. Sirolimus can impair wound healing and promote lymphatic compli-
110 cations (delayed wound healing, lymphocele). Non-infectious interstitial pneumonitis is uncommon
111 but important and typically resolves after dose reduction or withdrawal [14]. Although not directly
112 nephrotoxic, sirolimus has been linked to de novo or worsening proteinuria in some patients, some-
113 times progressing to nephrotic-range proteinuria or focal segmental glomerulosclerosis, prompting
114 discontinuation [15]. Reproductive effects: in men, impaired spermatogenesis and reduced paternity
115 rates have been reported [17].

116 **Reproducibility Statement**

117 We release the exact inputs and derived outputs used for all results. Ground truth is the leaflet §4.8
118 preferred-term list with SOC and frequency bands. System and baseline predictions are provided
119 as split-by-term claim tables with SOC mapping and citation flags. Matching is deterministic and
120 auditable; synonyms are not credited. We compute four metrics (term, SOC macro, frequency-
121 weighted coverage, and citation accuracy) and report 95% CIs (Wilson for proportions; bootstrap
122 for macro/weighted). A single script rebuilds all tables and figures from three CSV files.

123 **Responsible AI Statement**

124 The system is intended for drafting and triage under expert supervision and must not replace clinical
125 judgment or regulatory review. We report limitations and risks and adhere to community ethics
126 guidelines.

127 **AI Contribution Disclosure (Checklist)**

128 Hypothesis/scoping: agent-led with human oversight.
129 Data handling (leaflet parsing): agent-led with human oversight.
130 Method design (split, metrics): agent-led.
131 Experiments: agent-led.
132 Writing: agent-led with human oversight.
133 Visualization: agent-led.
134 Human role: oversight and final editing.

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