



DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

October 03 2007

NADA 141-214 (L0438)

Deborah Blue
Compliance Coordinator, Regulatory Affairs
Merial Limited
3239 Satellite Boulevard; Building 500
Duluth, GA 30096-4640

Re: NADA 141-214 Zimecterin® Gold (ivermectin 1.55%/praziquantel 7.75%) Paste for Horses; promotional labeling pieces: ZGDCSA7STFRTAPES, ZGDCSA7STFRBOT; and ZGDTDA7ZGFULLDETREV

Dear Ms. Blue:

The Center for Veterinary Medicine (CVM) has reviewed three promotional labeling pieces (ZGDCSA7STFRTAPES, ZGDCSA7STFRBOT, and ZGDTDA7ZGFULLDETREV) for Zimecterin® Gold (ivermectin 1.55%/praziquantel 7.75%) submitted by Merial Limited under cover of form FDA 2301 dated May 22, 2007. These promotional labeling pieces promote Zimecterin® Gold for a new intended use that is not the subject of the approved new animal drug application (NADA). When promoted for this new unapproved use, Zimecterin® Gold is unsafe within the meaning of section 512(a) (1) [21 USC 360b (a) (1)] of the Federal Food, Drug, and Cosmetic Act (the Act) and adulterated under section 501(a) (5) [21 USC 351(a) (5)] of the Act.

Further, you are packaging your drug in an “All Season Pack” containing six pre-filled syringes. The labeling on the “All Season Pack” does not conform to the product labeling approved in your new animal drug application. Therefore, your drug is unsafe within the meaning of section 512(a) (1) [21 USC 360b (a) (1)] of the Act, and adulterated within the meaning of section 501(a) (5) [21 USC 351(a) (5)] of the Act.

In addition, the promotional labeling pieces are false or misleading because they fail to reveal risk information for Zimecterin® Gold. Therefore, your drug is misbranded within the meaning of sections 502(a) [21 U.S.C. 352(a)] and 201(n) [21 U.S.C. 321(n)] of the Act.

Moreover, the promotional labeling ZGDTDA7ZGFULLDETREV presents unsubstantiated effectiveness claims. Therefore, your drug is misbranded within the meaning of sections 502(a) [21 U.S.C. 352(a)] of the Act.

Background

Zimecterin® Gold is a non-prescription oral paste for use in horses for the treatment and control of a variety of intestinal parasites. The product was approved as single unit syringes that will treat horses weighing up to 1250 pounds. Each weight marking on the syringe plunger delivers enough paste to treat 250 pounds of body weight.

The FDA-approved labeling for Zimecterin® Gold (ivermectin 1.55%/praziquantel 7.75%) Paste for Horses contains the following statements:

in the **INDICATIONS** section:

Consult your veterinarian for assistance in the diagnosis, treatment, and control of parasitism.

in the **PARASITE CONTROL PROGRAM** section:

Foals should be treated initially at 2 months of age, and routine treatment repeated as appropriate. Consult your veterinarian for a control program to meet your specific needs.

in the **WARNING** section;

Do not use in horses intended for human consumption. Not for use in humans. Keep this and all drugs out of reach of children.

in the **PRECAUTIONS** section:

ZIMECTERIN® GOLD Paste has been formulated specifically for use in horses **only**. This product should not be used in other animal species as severe adverse reactions, including fatalities in dogs, may result.

in the **Post-Approval Experience** section:

Although not all adverse reactions are reported, the following reactions are based on voluntary post-approval drug experience reporting. There have been rare reports of swelling and irritation of the mouth, lips, and tongue following administration of ZIMECTERIN® GOLD. These reactions have been transitory in nature.

in the **Environmental Safety** section:

Ivermectin and excreted ivermectin residues may adversely affect aquatic organisms. Do not contaminate ground or surface water. Dispose of the syringe in an approved landfill or by incineration.

New Intended Use

The promotional labeling pieces identified above contain recommendations to use the product once every other month. The promotional labeling piece, ZGDCSA7STFRTAPES, contains the statements, “Now available in an All-Season Pack – a year’s supply of the gold standard” and “Follow these steps, and use ZIMECTERIN GOLD every other month to help protect your horse from tapeworms and other parasites – all year-round.” The promotional labeling piece, ZGDCSA7STFRBOT, contains the statements, “Now available in an All-Season Pack – a year’s supply of the gold standard” and “By following these simple steps, and using ZIMECTERIN GOLD every other month, you can help protect your horse from bots all year-round.” In addition, the promotional labeling piece, ZGDTDA7ZGFULLDETREV, states, “One All-Season Pack treat[s] one horse for an entire year, or six horses at once.”

These statements promote the product for a new intended use that is not the subject of the approved NADA. In fact, the approved intended use does not indicate a dosing frequency, but instead advises consulting with a veterinarian for a control program to meet the horse owner’s specific needs. Not all horses will need the same dosing frequency. For example, the “All-Season Pack” statements to use every other month do not consider the tremendous variability between equine management schemes, medical status, and weights (Miniature horses, Draft horses, foals, etc.) of horses.

Therefore, when promoted for this unapproved intended use, Zimecterin® Gold is unsafe within the meaning of section 512(a) (1) [21 USC 360b (a) (1)] of the Act and adulterated under section 501(a) (5) [21 USC 351(a) (5)] of the Act.

Product Labeling Not in Conformance to Approved Application

You are packaging your drug in an “All Season Pack” containing six pre-filled syringes. The labeling of the “All Season Pack” does not conform to the product labeling approved in your new animal drug application. Therefore, when packaged in this “All Season Pack,” Zimecterin® Gold is unsafe within the meaning of section 512(a) (1) [21 USC 360b (a) (1)] of the Act, and adulterated within the meaning of section 501(a) (5) [21 USC 351(a) (5)] of the Act.

Omission of Risk Information

None of the promotional labeling identified above disclose any risk information regarding the use of Zimecterin® Gold. The “**Post-Approval Experience**” section of the approved labeling provides important safety information regarding oral swelling and irritation. These are important facts that horse owners should be aware of when considering use of the product. The lack of such risk information causes the drug to be misbranded within the meaning of sections 502(a) [21 U.S.C. 352(a)] and 201(n) [21 U.S.C. 321(n)] of the Act.

Unsubstantiated Claims of Effectiveness

The promotional labeling piece, ZGDTDA7ZGFULLDETREV, contains a claim that this product is “Fully effective, even against small strongyles resistant to benzimidazole products” and “With regular use of ZIMECTERIN GOLD, small strongyles are fully controlled – with no rotation needed.” These statements are misleading. The use of the word “fully” implies that the product has demonstrated 100% effectiveness against small strongyles. We are

unaware of any data to support this claim. Additionally, we are unaware of any data to support the “no rotation needed” statement. That is, data that shows no resistance will develop to the product as a result of its use and that it will continue to be effective. If you have substantial evidence of such effectiveness, please provide it to us. Moreover, the “no rotation needed” statement is misleading because it contradicts the product labeling itself which instructs consumers to, “Consult your veterinarian for a control program to meet your specific needs.”

When promoted with these claims, Zimecterin® Gold is misbranded within the meaning of sections 502(a) [21 U.S.C. 352(a)] the Act.

Conclusion and Requested Action

As discussed above, your product is adulterated within the meaning of section 501(a) (5) [21 USC 351(a) (5)] of the Act and misbranded within the meaning of sections 502(a) [21 U.S.C. 352(a)] and 201(n) [21 U.S.C. 321(n)] of the Act.

The violations described in this letter do not necessarily constitute an exhaustive list. It is your responsibility to see that your promotional labeling for Zimecterin® Gold comply with the requirements of the Act and its implementing regulations.

CVM requests that Merial Limited immediately cease the dissemination of the Zimecterin® Gold promotional labeling pieces identified above, and all similar promotional items. Future promotional labeling should adequately address risk information, and present only those claims that are included in the current FDA-approved labeling. Additionally, we request that you immediately cease the use of the “All Season Pack” until you have submitted a supplemental new animal drug application covering these labeling changes to the Office of New Animal Drug Evaluation, as required by 21 CFR 514.8. Please submit a written response within 30 days of receipt of this letter describing your intent to comply with these requests. Please direct your response to Dr. Lynn Post, Director, Division of Surveillance, Office of Surveillance and Compliance, Center for Veterinary Medicine, 7519 Standish Place, Rockville, MD 20855.

Sincerely yours,

Daniel G. McChesney, Ph.D.
Director, Office of Surveillance
and Compliance
Center for Veterinary Medicine