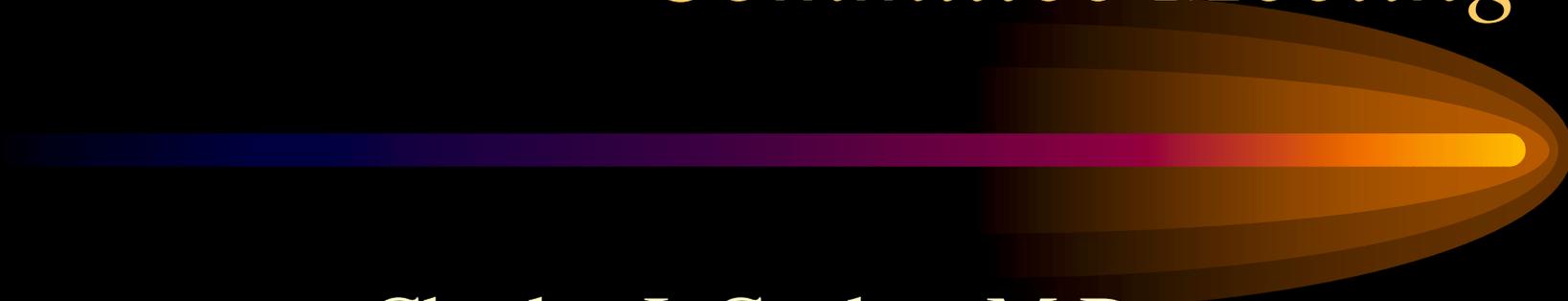


*Nonprescription Drugs Advisory
Committee Meeting*



Charles J. Ganley, M.D.

Division of OTC Drug Products

September 19, 2002

Outline

- Marketing of OTC Drug Products and the OTC Drug Review of Monographs
- Why now?
- Safety and Effectiveness of Internal Analgesic Products
- Topic for today's discussion: Unintentional Acetaminophen Overdose

OTC Marketing of Drug Products

- OTC drugs can be marketed under two different regulatory paths
 - OTC Drug Review
 - Drug Monographs categorized by indications, pharmacological effect and body system affected
 - New Drug Application (NDA)

OTC Drug Review

- Data collection for ingredients
- Drug Review Panel
- Publication of a panel report
- Tentative Final Monograph (Proposed Rule)
- Final monograph
 - generally recognized as safe and effective (GRAS)
 - establishes the conditions of use
 - ingredient, indication, dose, test methodologies, warnings, directions for use

Why now?

- Monograph for Internal Analgesic, Antipyretic, Anti-inflammatory Drug Products
- Ongoing OTC Drug Review
- Review information available since the publication of the Tentative Final Monograph (1988)

OTC Internal Analgesics

- Monograph
 - Acetaminophen
 - Aspirin
 - Non-Aspirin Salicylates
 - Adjuvant (caffeine)
- New Drug Applications
 - Ibuprofen
 - Ketoprofen
 - Naproxen sodium
 - Acetaminophen
 - Extended release
 - Suppository

Risk/Benefit of OTC Internal Analgesic Drug Products

- Consumers can self diagnose and treat intermittent minor aches and pain without the need for a healthcare provider.
- Serious adverse events are rare. The majority of consumers use these products safely.
- The benefit of these therapies outweigh the risks associated with their use.

OTC Internal Analgesics

- The availability of these ingredients in OTC drug products is not an issue.
- The Agency believes that these products should remain available as over the counter drug products.

Unintentional Acetaminophen Hepatotoxicity

- February 2001 Liver Toxicity Workshop
 - In a registry of patients on liver transplant lists, unintentional acetaminophen overdose accounted for 60 % of acetaminophen related cases
- Reports of liver toxicity with repeat dosing of acetaminophen in the literature and adverse event reports submitted to FDA

Acetaminophen Overdose

- Hepatotoxicity can occur with excessive single doses of acetaminophen
 - Intentional: Suicide
 - Accidental: Child Ingestion
- Liver toxicity occurring under these circumstances are not the focus of today's meeting

Risk Perspective

- Number of events per year is difficult to ascertain
- Can reasonable measures be implemented to prevent these events?
- Cannot expect to prevent all unintentional adverse events

Risk Management

- Are there identifiable circumstances or factors that contribute to these events?
- Do we understand consumer or health provider behaviors that may influence the circumstances or factors?

Risk Management

- Can the circumstances or factors be influenced by interventions?
- Are there interventions that may prevent events or decrease the severity of events?
- Is additional research needed to address some of the issues?