



**sanofi aventis**

Because health matters

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November 21, 2005

Via fax and UPS

Division of Dockets Management (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

**Re: Docket No. 2005D-0310**

*Draft Guidance for Industry on Gene Therapy Clinical Trials – Observing Participants for Delayed Adverse Events*

Dear Sir/Madam:

Sanofi-Synthelabo Inc. and Aventis Pharmaceuticals, members of the sanofi-aventis Group, appreciate the opportunity to comment on the *Draft Guidance for Industry on Gene Therapy Clinical Trials – Observing Participants for Delayed Adverse Events*.

This draft guidance provides sponsors of gene therapy studies with recommendations regarding collection of data on delayed adverse events in participants who have been exposed to gene therapy products.

The guidance is welcome and in particular the recognition of the concerns raised by the Gene Therapy Community following the 2001 FDA request to follow patients for a time period of 15 years. We have reviewed the guidance and propose the following comments for your consideration.

**SPECIFIC COMMENTS:**

***Page 12: Section IV, Item C. Vector Integration Potential and Reactivation as Risks for Delayed Adverse Events***

The guidance would benefit from a clear distinction between the vectors with a propensity to integrate from those that do not have a propensity to integrate, e.g. plasmids, poxvirus, adenovirus, etc... A distinction is made only for retroviral vectors in the guidance.

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For clarity, we request a separate section between non-viral vectors and viral vectors. The section on viral vectors would then be further divided into a section on vectors with a propensity to integrate and a section on vectors that do not have a propensity to integrate.

On behalf of Sanofi-Synthelabo Inc. and Aventis Pharmaceuticals, members of the sanofi-aventis Group, we appreciate the opportunity to comment on the *Draft Guidance for Industry on Gene Therapy Clinical Trials – Observing Participants for Delayed Adverse Events* and are much obliged for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Caffé', with a large, sweeping flourish extending to the left.

Steve Caffé, M.D.  
Vice President, Head US Regulatory Affairs