

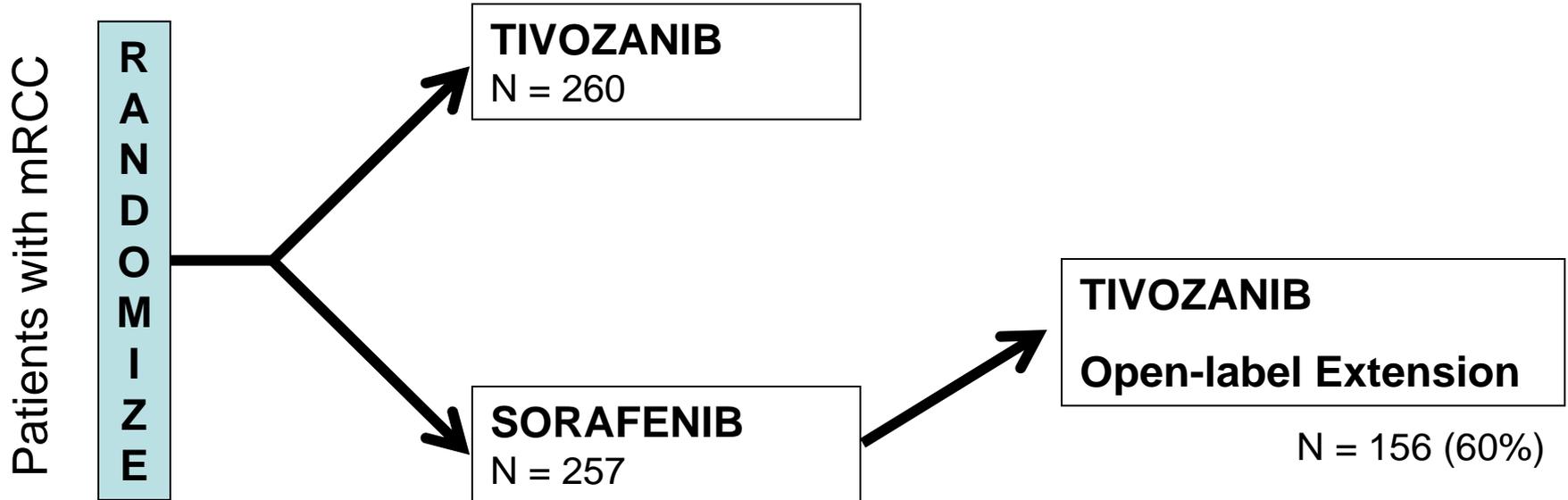


Tivozanib

For the treatment of advanced Renal Cell Carcinoma

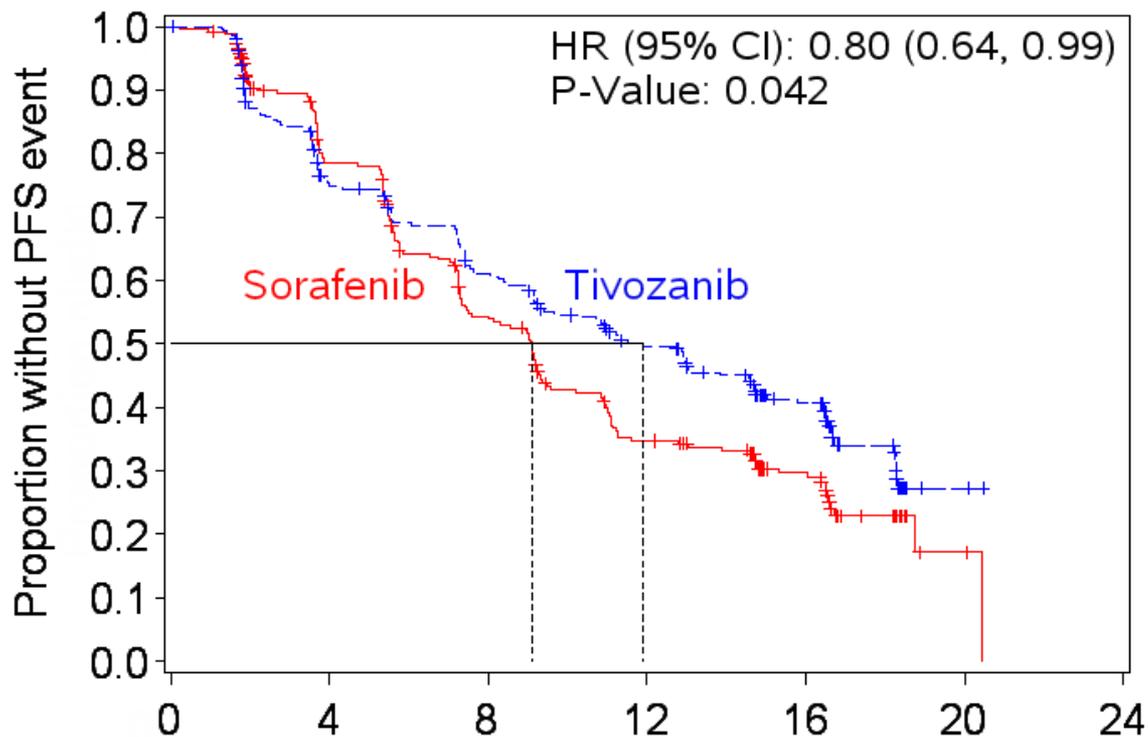
Amna Ibrahim MD
Deputy Director
Div. Of Oncology Products 1

Trial Schema



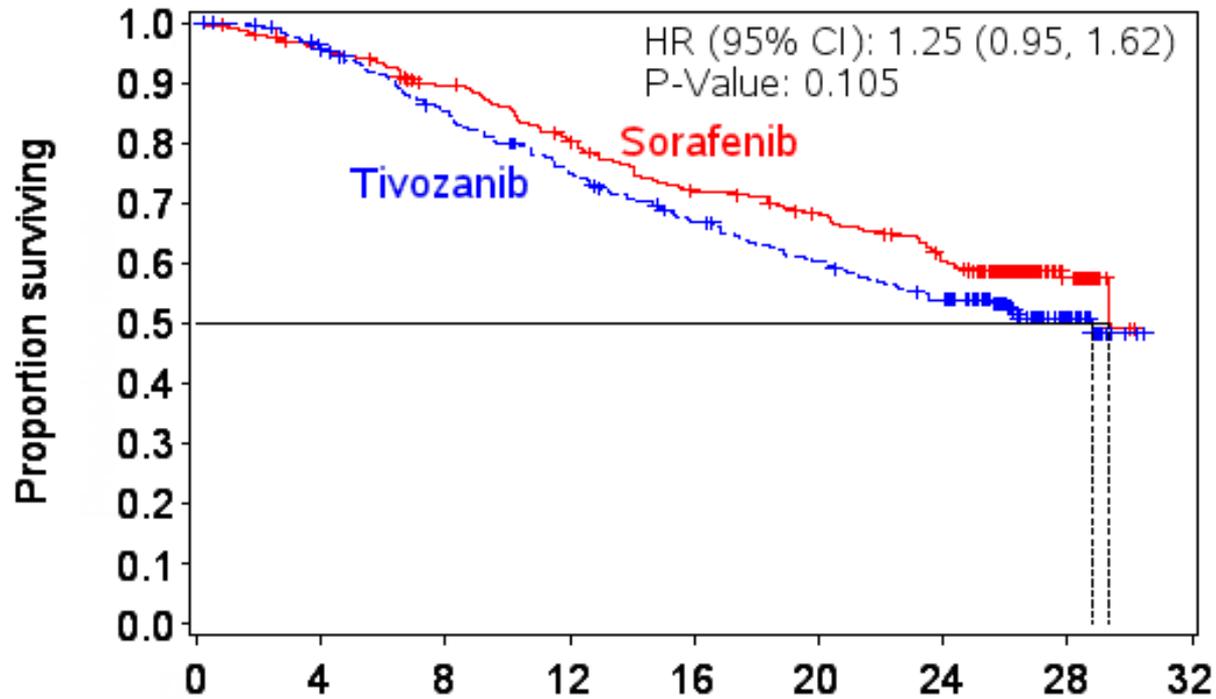
Primary endpoint: PFS

Improvement in PFS



Patients at Risk	Progression-Free Survival (Months)					
	0	4	8	12	16	20
Sorafenib	257	184	120	73	44	2
Tivozanib	260	181	144	109	65	2

Increase in risk of death



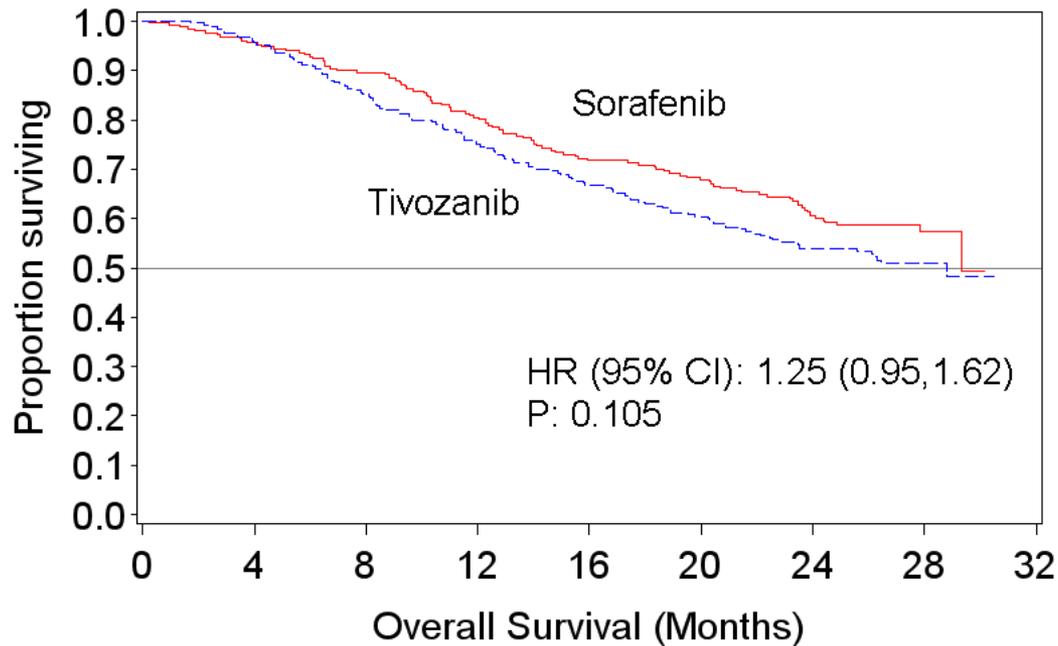
Patients at Risk	Overall Survival (Months)								
	0	4	8	12	16	20	24	28	32
Sorafenib	257	241	218	194	170	157	137	43	0
Tivozanib	260	241	211	183	159	142	125	39	0

Concerns

- The inconsistent PFS and OS results and imbalance in post study treatments makes the trial results inconclusive when making a risk-benefit assessment necessary for approval of a drug
- Has the Applicant demonstrated a favorable benefit to risk evaluation for the treatment of renal cell carcinoma in an adequate and well-controlled trial?

Tivozanib

Advanced Renal Cell Cancer



Jacinta Arrington & Jonathan Jarow
Division of Oncology Products 1, OHOP, CDER

Outline

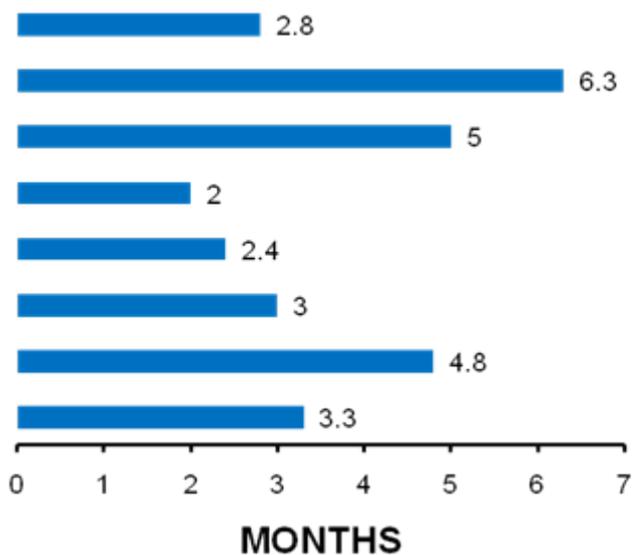
- Current Available Therapies
- Trial Design and Conduct
- Applicant's Exploratory Analyses
- Comparable Toxicity Profile
- Question to ODAC

Currently Approved Targeted Therapies

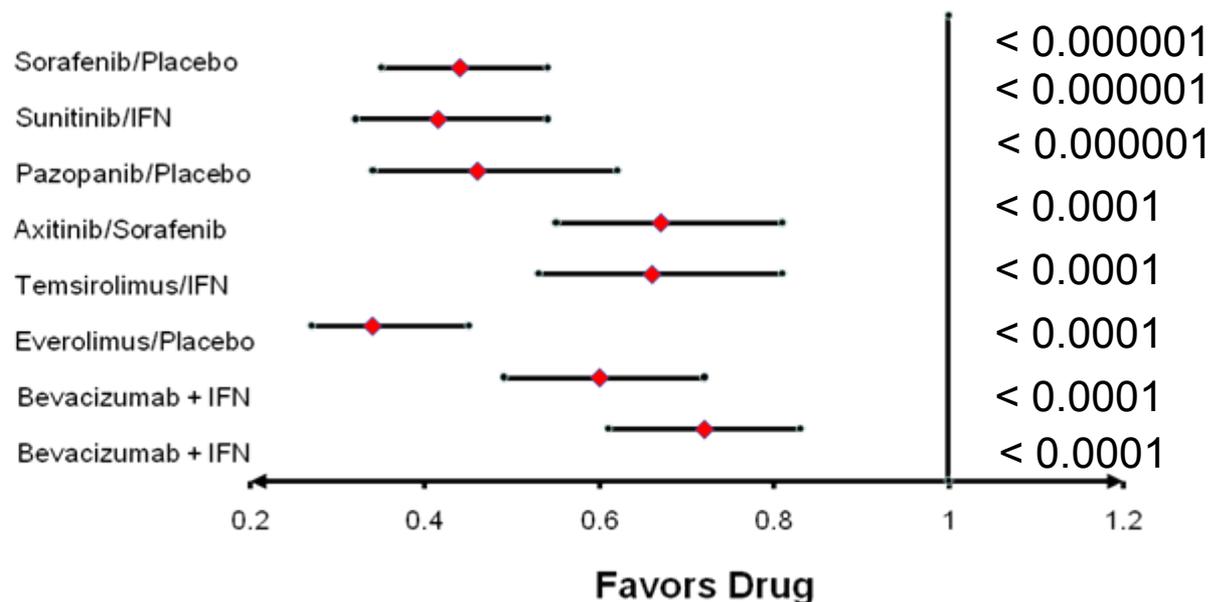
Drug	Comparator	Endpoint	Prior Targeted Rx
Sorafenib	Placebo	PFS	No
Sunitinib	IFN- α	PFS	No
Pazopanib	Placebo	PFS	No
Bevacizumab (+ IFN- α)	IFN- α alone	PFS	No
Temsirolimus	IFN- α	OS	No; poor prognosis
Everolimus	Placebo	PFS	Yes
Axitinib	Sorafenib	PFS	Yes

Progression-Free Survival Basis for Prior Approvals

Median PFS Δ



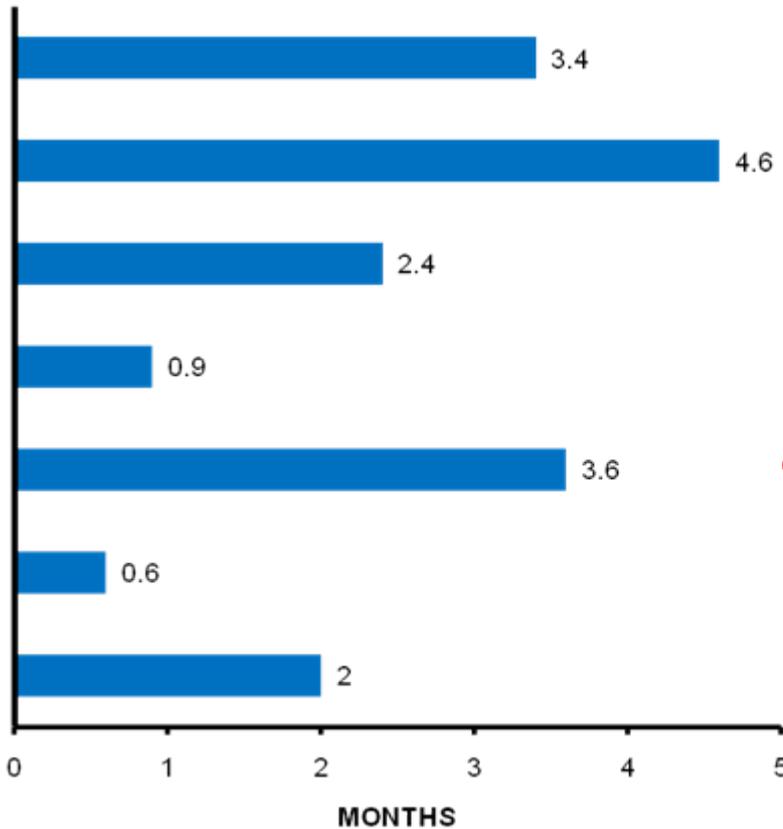
Progression-Free Survival



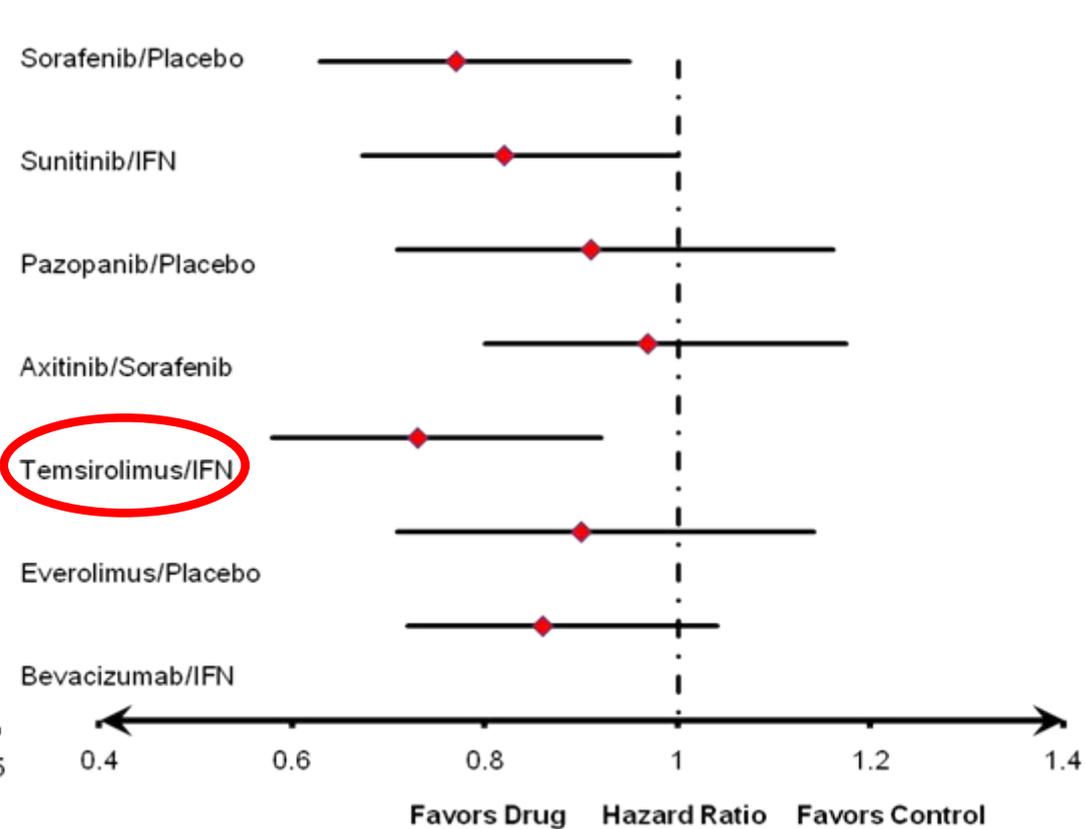
Overall Survival

Basis for Approvals

Median Survival Δ



Overall Survival



Many Trials Have Imbalanced Subsequent Therapy

	Post-Progression Crossover		Subsequent Targeted Therapy*	
	Allowed	%	Study Arm	Comparator Arm
Sorafenib/Placebo	Yes	48%	---	---
Sunitinib/ IFN-α	Yes	39%	53%	69%
Bevacizumab/IFN-α	Yes	4%	54%	62%
Pazopanib/Placebo	Yes	54%	22%	63%
Temsirolimus/IFN-α	No	---	---	---
Everolimus/Placebo	Yes	80%	---	---
Axitinib/Sorafenib	No	---	---	---

* Includes both study drug and subsequent use of VEGF or MTOR therapies off protocol

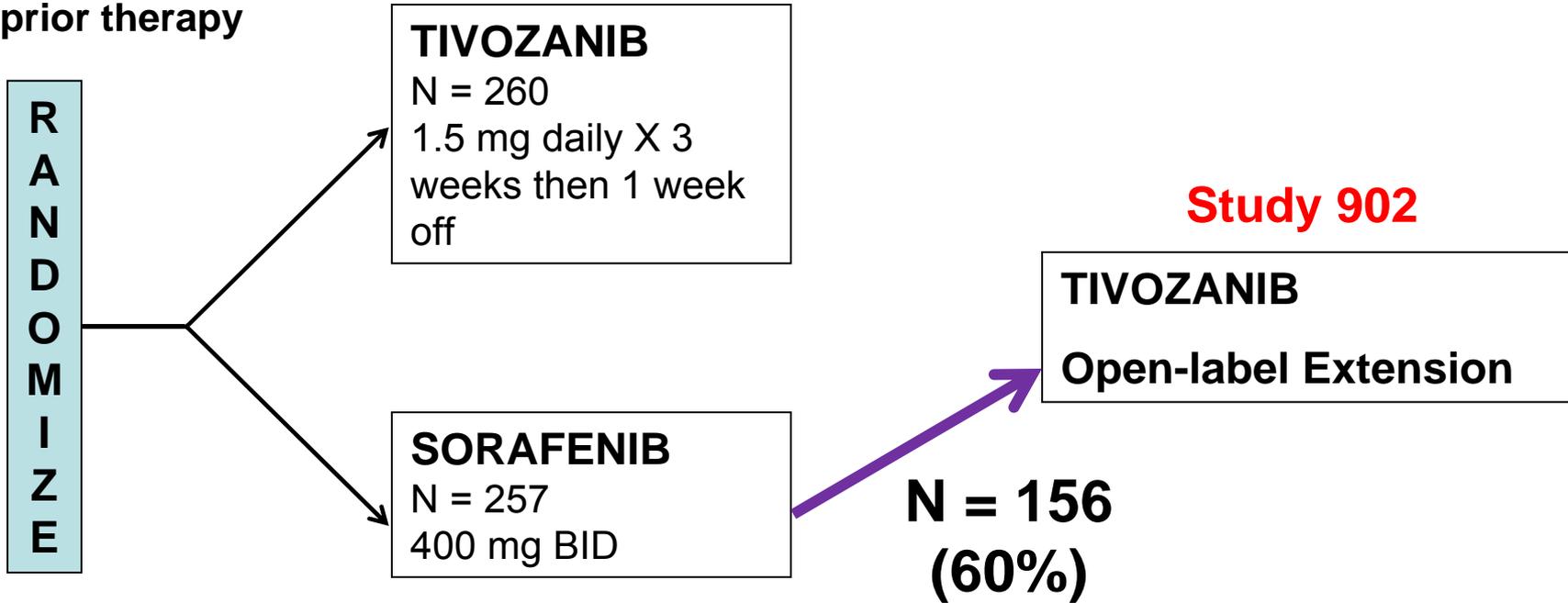
Main Findings

- Phase 2 randomized withdrawal data
- Single Phase 3 trial with inconsistent results
- Advantage in progression-free survival against an active comparator
- Potential increased risk of death
- Should another trial be performed before approval?

Trial Schema

517 Patients

- Metastatic RCC
- Measurable disease
- ≤ 1 prior therapy



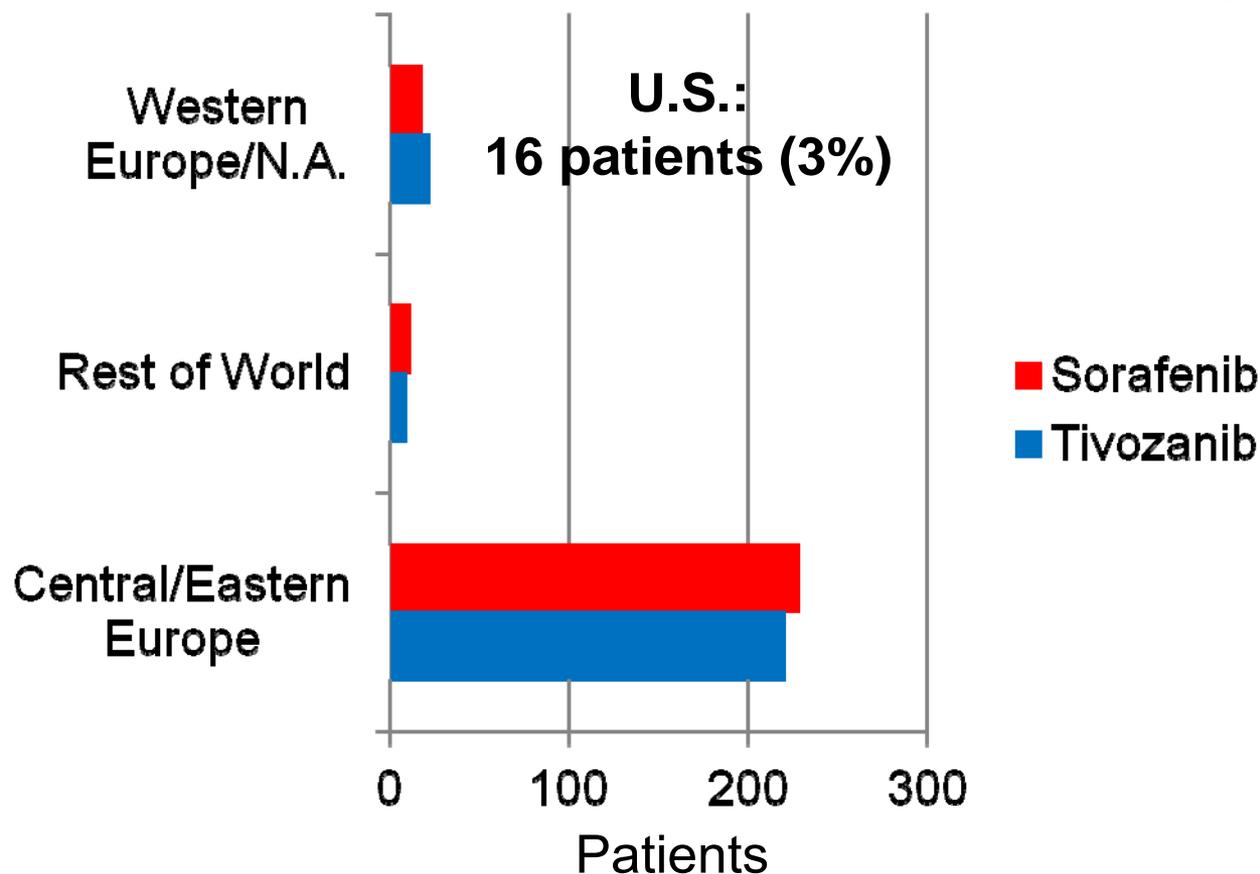
Study 301

Study 902

STRATIFICATION

1. Geographic Region
2. Prior Treatments
3. Metastatic Sites

Less than 10% of Patient Population from U.S. or Western Europe



Subsequent Targeted Therapy

- **Sorafenib arm: 163 (63%)**
 - “Crossover” to tivozanib: 156
 - Subsequent therapy off protocol: 8*
- **Tivozanib arm: 41 (16%)**
 - Subsequent therapy off protocol: 41
 - Western Europe/N.A.: 10/22 (45%)
 - Central/Eastern Europe: 30/229 (13%)
 - Rest of World: 1/9 (11%)

* Some patients who crossed over also received subsequent targeted therapies off-protocol

Statistical Analysis Plan

- Primary endpoint: Progression-free survival by independent radiologist in the ITT population
 - Stratified (# of prior treatments, # metastatic organs) log-rank test
 - 90% power with 310 PFS events
- First secondary endpoint: Overall survival
- Duration of response and objective response rates

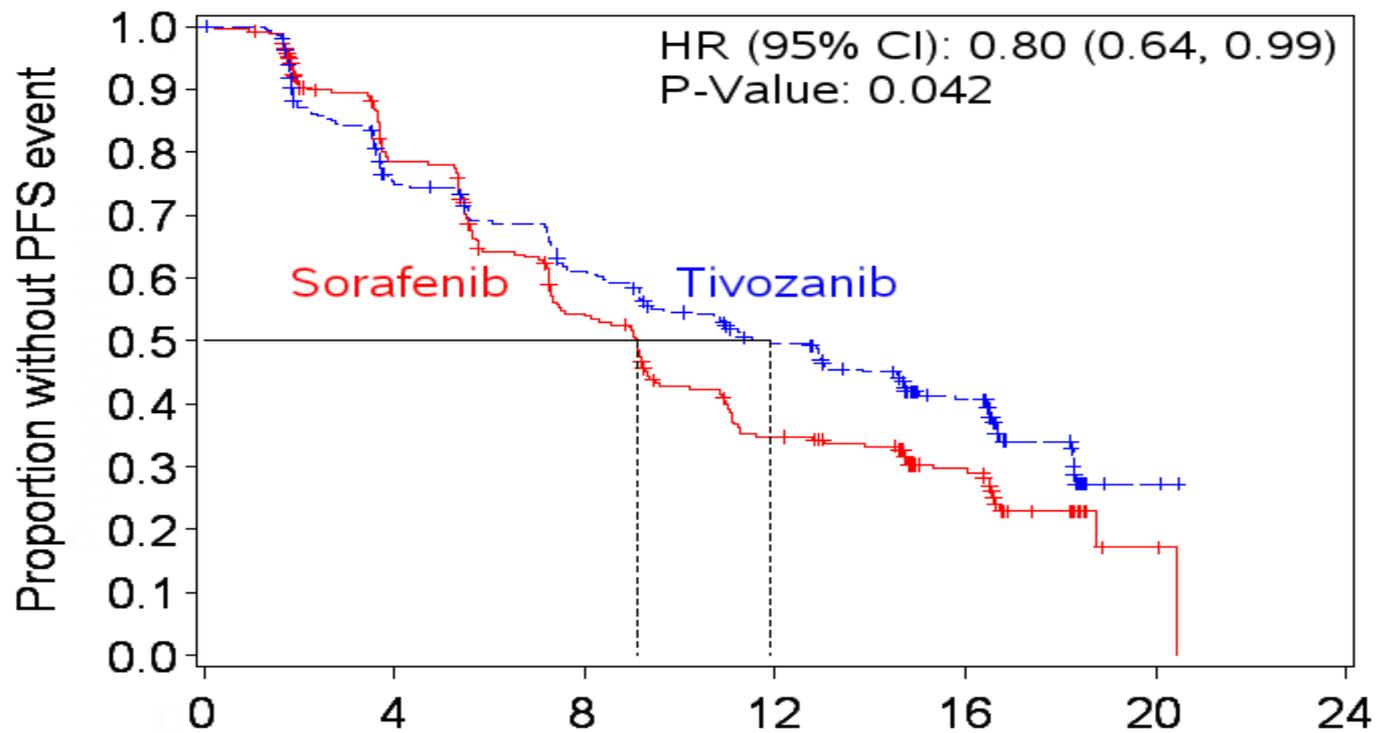
Baseline Disease Characteristics

	Tivozanib (N = 260)	Sorafenib (N = 257)
Median Time Since Diagnosis	15 mos	17 mos
Prior Treatments		
0	70%	70%
≥ 1	30%	30%
MSKCC Prognostic Group		
Favorable	54%	60%
Intermediate	45%	39%
Poor	0.8%	0.4%

Progression-Free Survival Primary Efficacy Endpoint

	Tivozanib N=260	Sorafenib N=257
PFS event (%)	153 (59)	168 (65)
Number of patients with progression (%)	139 (54)	156 (61)
Number of patients with deaths (%)	14 (5)	12 (5)
Median PFS in months (95% CI)	11.9 (9.3, 14.7)	9.1 (7.3, 9.5)
Hazard ratio (95% CI)	0.80 (0.64, 0.99)	
P-value	0.042	

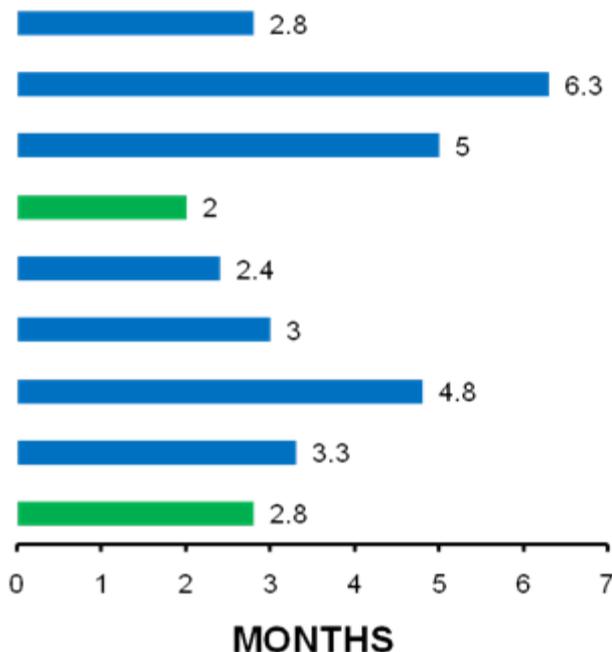
Kaplan-Meier Plot for PFS



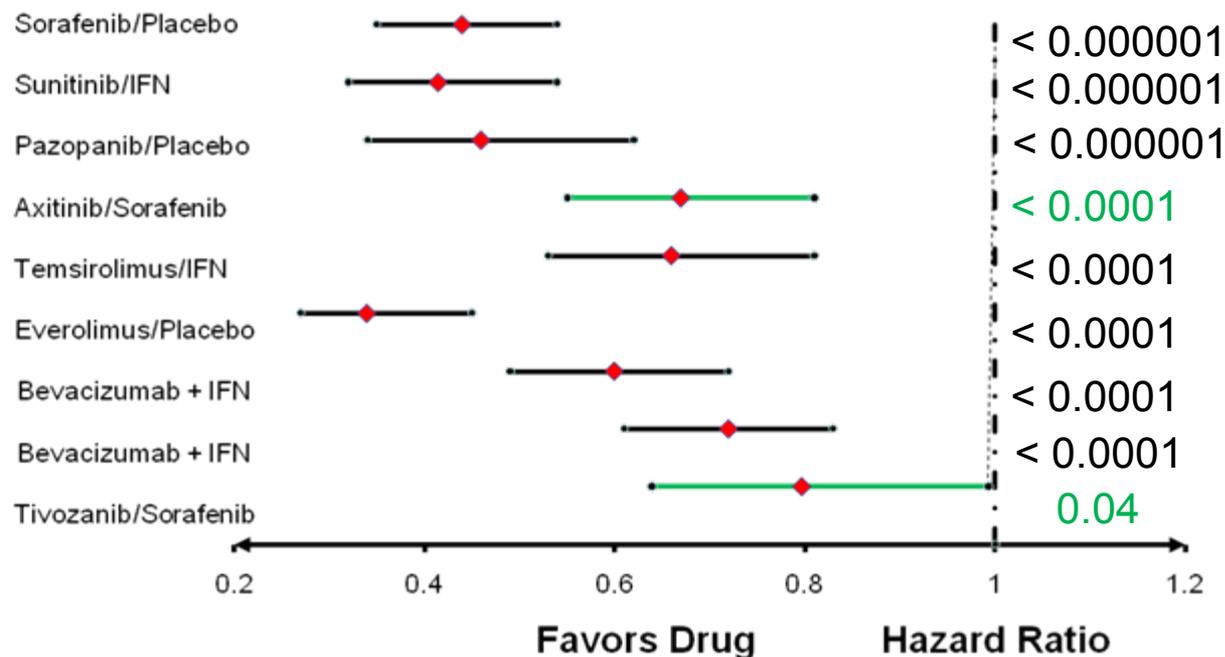
Patients at Risk	Progression-Free Survival (Months)						
	0	4	8	12	16	20	24
Sorafenib	257	184	120	73	44	2	0
Tivozanib	260	181	144	109	65	2	0

Progression-Free Survival (Not for Comparison)

Median PFS Δ



Progression-Free Survival

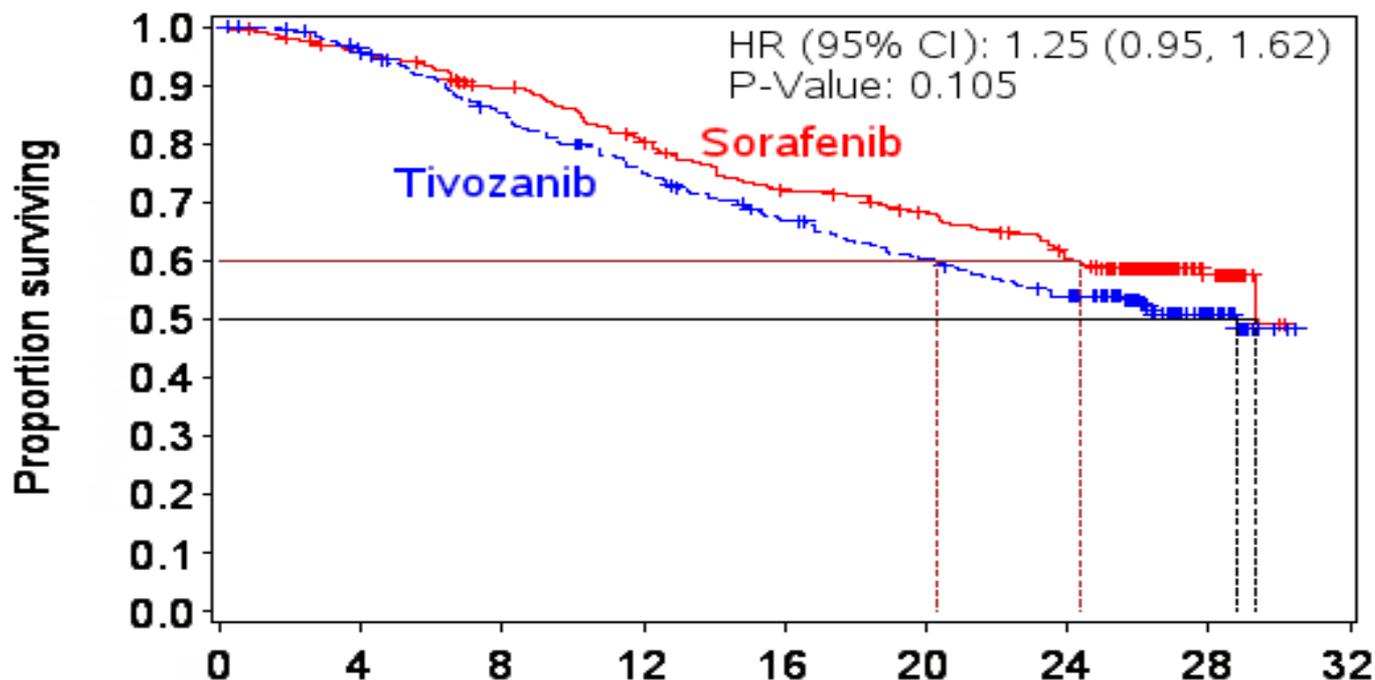


Trials in green were the only ones to use a targeted therapy (Sorafenib) as an active comparator

Overall Survival

	Tivozanib N = 260	Sorafenib N = 257
Events	118 (45%)	101 (39%)
Median (months) (95% CI)	28.8 (22.5, NE)	29.3 (29.3, NE)
Hazard Ratio (95% CI)	1.25 (0.95, 1.62)	
p-value	0.105	

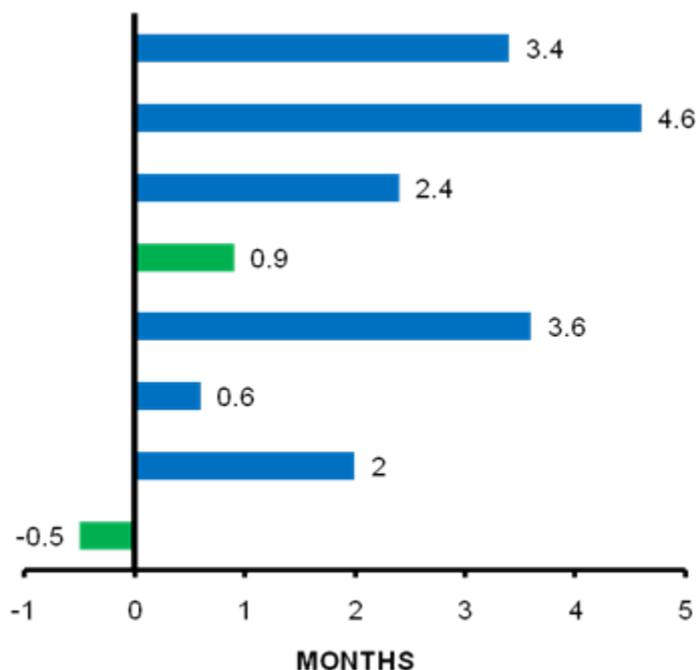
Kaplan-Meier Plot for Overall Survival



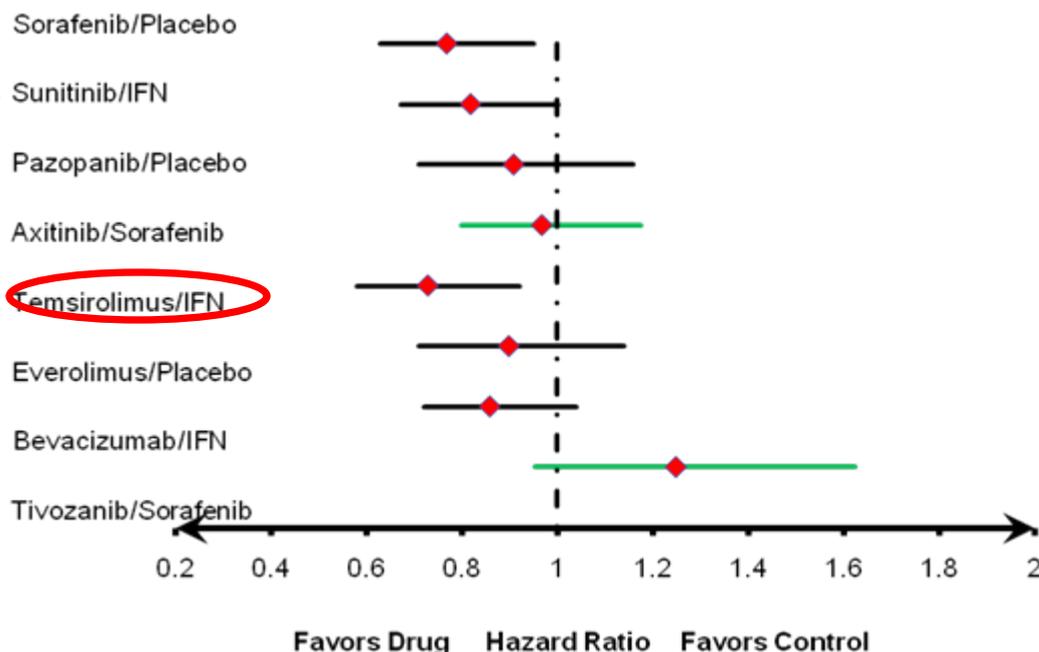
Patients at Risk	Overall Survival (Months)								
	0	4	8	12	16	20	24	28	32
Sorafenib	257	241	218	194	170	157	137	43	0
Tivozanib	260	241	211	183	159	142	125	39	0

Targeted Therapies: Overall Survival (Not for Comparison)

Median Survival Δ



Overall Survival

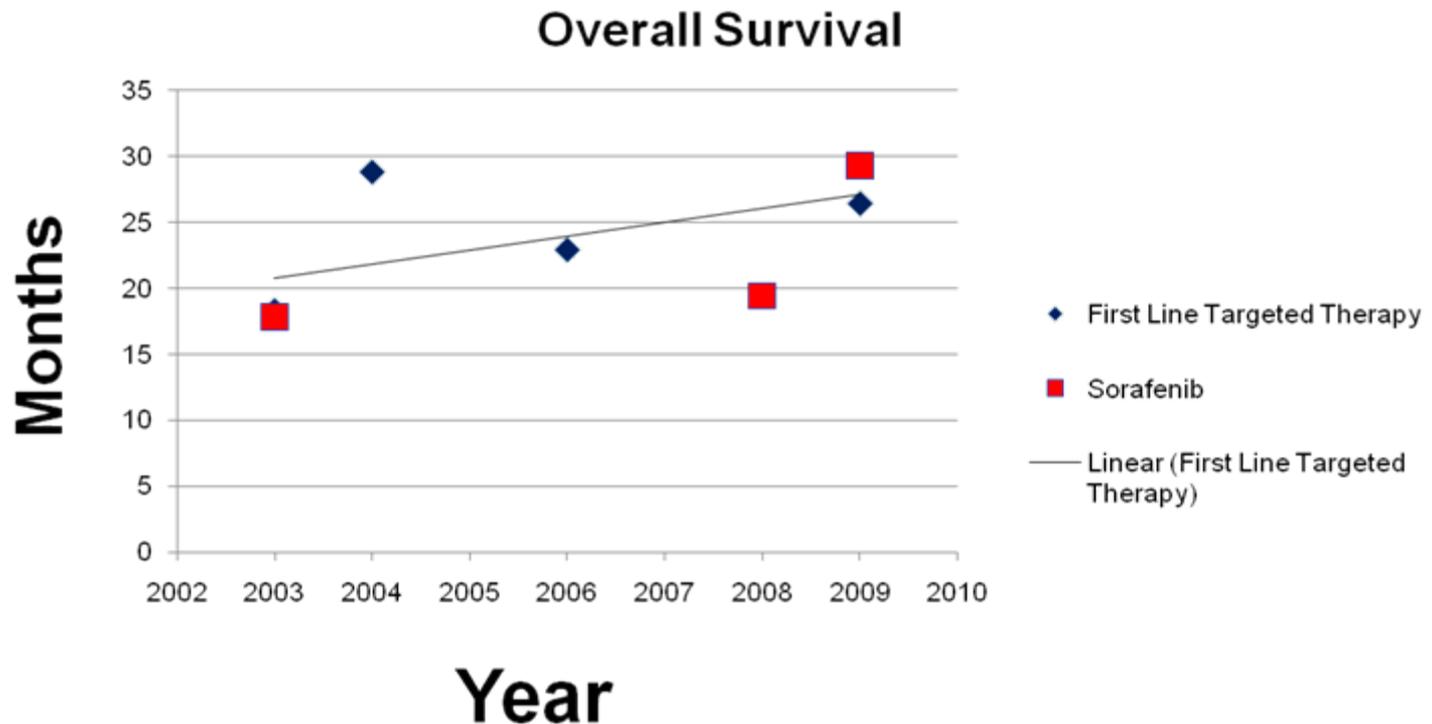


Post Hoc Exploratory Analyses

- Post-progression survival
- Subgroup analyses
 - Region
 - Exposure
 - Subsequent therapy
- Long median survival

Hypothesis Generating

Effect of Year of Study on Overall Survival



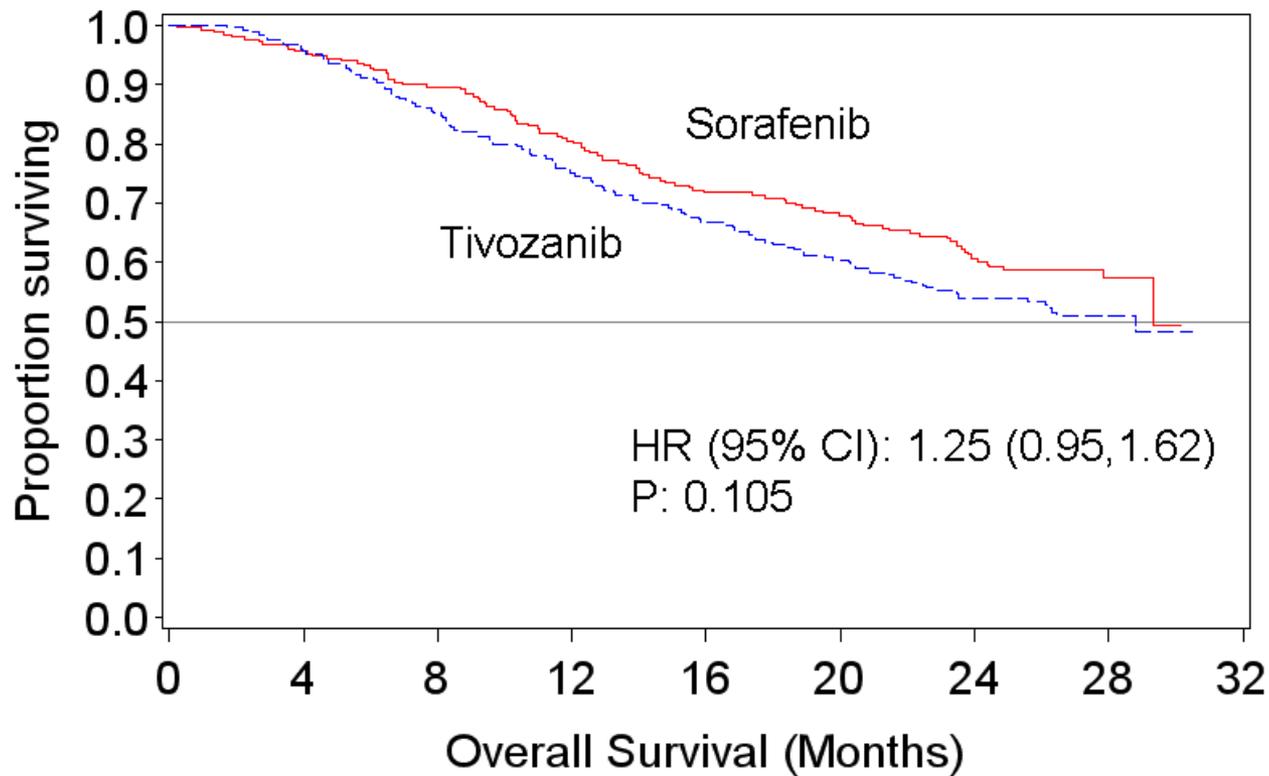
Efficacy Summary

- Improved progression-free survival against active comparator
 - H.R.: 0.8 p value: 0.042
- Negative trend in overall survival
 - H.R.: 1.25 p value: 0.1



SAFETY

Increase in Risk of Death





Deaths in the Phase 3 Trial

Deaths	Tivozanib N=259 (%)	Sorafenib N=257 (%)
All Deaths (data cutoff 8-27-2012)	118 (45)	101 (39)
Deaths within 30 days of treatment (data cutoff 6-1-12)	21 (8.1)	14 (5.4)
Deaths attributed to PD within 30 days	8 (3)	2 (0.1)
Deaths attributed to AEs within 30 days	13 (5)	12 (4.7)

Adverse Events by Region

	Central/Eastern Europe N = 456	North America/ Western Europe N = 40	Rest of World N = 20
Grade 1-4	93%	100%	90%
Grade 3-4	59%	88%	75%



Adverse Events in > 10% of Patients

	Tivozanib N = 259		Sorafenib N = 257	
	Grade 1-4	Grade 3-4	Grade 1-4	Grade 3-4
All	90%	57%	97%	68%
Hypertension	46%	27%	36%	18%
Diarrhea	22%	2%	33%	7%
Dysphonia	21%	0	5%	0
Fatigue	19%	5%	16%	4%
Weight Decreased	18%	3%	21%	4%
Asthenia	15%	4%	17%	3%
Stomatitis	15%	0.8%	12%	0.8%
Infections	15%	2%	17%	4%
Back Pain	13%	3%	8%	2%
PPE	13%	2%	54%	17%
Abdominal Pain	12%	1%	11%	0.8%
Nausea	12%	0.4%	8%	0.4%
Dyspnea/Exertional Dyspnea	12%	2%	10%	2%
Decreased Appetite	11%	0.4%	10%	0.4% 26



Adverse Events in > 10% of Patients

	Tivozanib N = 259		Sorafenib N = 257	
	Grade 1-4	Grade 3-4	Grade 1-4	Grade 3-4
All	90%	57%	97%	68%
Hypertension	46%	27%	36%	18%
Diarrhea	22%	2%	33%	7%
Dysphonia	21%	0	5%	0
Fatigue	19%	5%	16%	4%
Weight Decreased	18%	3%	21%	4%
Asthenia	15%	4%	17%	3%
Stomatitis	15%	0.8%	12%	0.8%
Infections	15%	2%	17%	4%
Back Pain	13%	3%	8%	2%
PPE	13%	2%	54%	17%
Abdominal Pain	12%	1%	11%	0.8%
Nausea	12%	0.4%	8%	0.4%
Dyspnea/Exertional Dyspnea	12%	2%	10%	2%
Decreased Appetite	11%	0.4%	10%	0.4% 27

Adverse Events of Concern*

	Tivozanib N = 259			Sorafenib N = 257		
	All	3-4	5	All	3-4	5
Grade						
Hypertension	120	71	1	96	47	0
Hemorrhagic Events	28	5	1	14	2	1
Arterial Events	20	12	4	19	8	4
Venous Events	6	1	1	3	1	2
Cardiac Failure	4	2	2	7	3	2

* These adverse events are on-therapy or within 30 days following discontinuation ²⁸

Safety Summary

OS most important safety (and efficacy) endpoint

- Potential decrement in OS
 - HR 1.25, $p = 0.11$
 - 25% increase in the potential risk of death on the tivozanib arm
- AE profile is comparable to other drugs for mRCC
- Serious toxicities. Hypertension, cardiac dysfunction, thromboembolism, hepatic dysfunction and pancreatitis have caused deaths on tivozanib

Summary

- 20% improvement in PFS against sorafenib
- 25% potential increase in death compared to sorafenib
- Comparative safety profile
 - **Tivozanib**: higher HTN, hemorrhage, and dysphonia
 - **Sorafenib**: higher PPE, diarrhea

Why do we care about Overall Survival?

- Progression-free survival is primarily a radiological endpoint
- Overall survival assures both safety and efficacy
- Critical for the risk-benefit analysis
- Important endpoint for patients

Hypotheses

- Sequential therapy versus monotherapy
- Sorafenib is more effective than tivozanib for overall survival endpoint
- Tivozanib has greater delayed toxicity or toxicity not recognized

Conclusion

- Flawed trial design
- Internal inconsistency
- Uninterpretable Overall Survival results
- Inconclusive risk-benefit assessment



FDA Review Team

Project Management

Elleni Alebachew
Kim Robertson

Clinical

Jacinta Arrington
Jonathan Jarow
V. Ellen Maher (CDTL)

Statistics

Somesh Chattopadhyay
Shenghui Tang (TL)

Clinical Pharmacology

Jeffrey Huang
Qi Liu (TL)

Product Quality

Donghao Lu
Deborah Mesmer
Haripada Sarker (TL)

Non-Clinical

Eias Zahalka
Todd Palmby (TL)

Pharmacometrics

Jee Eun Lee
Nitin Mehrotra (TL)

Biopharmaceutics

John Duan
Angelica Dorantes (TL)