DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

FOI

Food and Drug Administration
Rockville MD 20857

JAN 16 1997

TRANSMITTED VIA FACSIMILE

Ellen R. Westrick
Senior Director
Office of Medical/Legal
Merck & Co., Inc.
P.O. Box 4, WP37C-116
West Point, Pennsylvania 19846

RE: NDA 19-766
Zocor (simvastatin)
MACMIS ID #4959

Dear Ms. Westrick:

Reference is made to Merck's sales aid #L4028-1196 for Zocor. The Division of Drug Marketing, Advertising and Communications (DDMAC) has reviewed this sales aid and finds it in violation of the Federal Food, Drug, and Cosmetic Act and the applicable regulations.

Specifically, DDMAC objects to the following claims and representations:

- The sales aid is misleading because it implies clinical superiority for Zocor over Pravachol in the absence of substantial comparative evidence to support such a claim. For example, the presentation of information about Pravachol on the inside left page juxtapositioned with the presentation of the comparative study of Zocor and Pravachol's lipid-lowering effects implies that Zocor is clinically superior to Pravachol and may lead to improved patient outcomes if Zocor is substituted for Pravachol. However, Zocor and Pravachol are not indicated for the same uses, and to suggest such interchangeability is misleading.

  In addition, the presentation of these data, with the pull down tab comparing 4S to WOSCOPS, is misleading because again it implies that Zocor will be superior to Pravachol if used in the population studied in WOSCOPS, i.e., as a primary prevention agent. However, Zocor is not currently indicated for this use.

In addition, the current presentation of the Zocor-Pravachol comparative trial data is misleading because it fails to provide any contextual information that describes the design of the study, the study population, baseline cholesterol levels, that the results represent mean reductions in total-C and LDL-C, or that the clinical relevance of the differences in lipid-lowering effect seen in this study has not been established.

- The statement "Only when pooled did the 4 angiographic trials with Pravachol achieve statistical significance" is misleading because it selectively presents information that implies Pravachol is less effective than has been demonstrated and minimizes the effects seen with Pravachol in these studies.

- The mere inclusion of the statement "WOSCOPS and 4S were not trials comparing Zocor and Pravachol" is not sufficient to adequately clarify the misleading representation that Zocor is superior to or interchangeable with Pravachol.

- The statement "Zocor is indicated for a wide range of patients with primary hypercholesterolemia..." is misleading because it implies that Zocor is indicated for a broader population that it is approved for. Without a definition of "wide range," this statement implies that Zocor is useful in a variety of subgroups of patients with hypercholesterolemia, a claim that is not currently supported.

- Finally, according to our records, this detail aid was only recently submitted (January 7, 1997) to the Agency at the time of initial dissemination in accordance with regulation 21 CFR 314.81(b)(3)(i). However, it is DDMAC's understanding that this detail piece has been in use since at least December 9, 1996.

In order to address these objections, DDMAC recommends that Merck take the following actions:

1. Immediately discontinue the use of the above referenced sales aid, and any other promotional materials that make the same or similar claims.

2. Provide to DDMAC, in writing, Merck's intent to comply with number one above.

3. Provide to DDMAC, in writing, Merck's intent to comply with the provisions of 21 CFR 314.81(b)(3)(i).

Merck's response should be received by January 30, 1997. If Merck has any questions or comments, please contact the undersigned by facsimile at (301) 594-6771, or in writing at DDMAC, HFD-40, Room 17B-20, 5600 Fishers Lane, Rockville, MD 20857.

In all correspondence related to this matter, please refer to MACMIS ID #4959, in addition to the NDA number.

Sincerely,

Russell Fleischer, PA-C, MPH
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications

File Name: zcr4959.nov

Drafted:	Fleischer	Date: 12/20/96
Comment:	Palmer	Date: 12/22/96
Revised:	Fleischer	Date: 12/23/96
Comment:	Palmer	Date: 1/7/97
Revised:	Fleischer	Date: 1/13/97
Concur:	Palmer	Date: 1/16/97

CC:
HFD-40/NDA 19-766
HFD-40/Chron/Fleischer/Palmer
HFD-510/NDA 19-766
HFD-510/Orloff

MACMIS File ID#: 4959

MACMIS Type Code: LETT
MACMIS Action Code: VIOL
2253 ID#:
2253 Material Code:
Material ID#:
Due Date: January 30, 1997
Close Out: N

FOI STATUS: RELEASABLE