DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

FOF

Food and Drug Administration
Rockville MD 20857

JUL 30 1998

TRANSMITTED VIA FACSIMILE

Fred Longenecker
Manager, Regulatory Affairs
Novo Nordisk Pharmaceuticals Inc.
Suite 200
100 Overlook Center
Princeton, NJ 08540-7810

RE: NDA 20-741
Prandin (repaglinide) tablets
MACMIS ID #6913

Dear Mr. Longenecker:

As part of its routine monitoring and surveillance program, the Division of Drug Marketing, Advertising and Communications (DDMAC) has become aware of a journal advertisement, disseminated by Novo Nordisk Pharmaceuticals Inc. (NNPI) for Prandin (repaglinide) that is in violation of the Federal Food, Drug and Cosmetic Act (Act) and applicable regulations. Specifically, DDMAC refers to an advertisement for Prandin appearing in the July/August, 1998 issue of the *Journal of Managed Care Pharmacy* that is in violation of the Act for the following reasons:

Minimizing the Incidence of Hypoglycemia

The claim that Prandin provides "...a low risk of severe hypoglycemia" is misleading because it minimizes the risk of hypoglycemia associated with Prandin. In fact, the ad fails to point out several material facts regarding the possibility of hypoglycemia as a result of Prandin therapy. For example, the approved product labeling (PI) for Prandin indicates that a significant number of patients (31%) in clinical studies experienced hypoglycemia while taking Prandin compared to 7% of patients on placebo. The PI also states that "[m]ild or moderate hypoglycemia occurred in 16% of Prandin patients...," and "[t]he most common adverse events leading to withdrawal were hyperglycemia, hypoglycemia, and related symptoms." Furthermore, the PRECAUTIONS section of the PI states that patients with hepatic insufficiency have increased risk of serious hypoglycemia. DDMAC refers NNPI to our March 2, 1998, letter regarding, among other things, the use of this and similar claims that minimize the risk of hypoglycemia in promotional materials for Prandin.

Lack of Fair Balance

The journal ad is misleading because it does not present any information relating to other common adverse events associated with Prandin, such as URI, headache, sinusitis, diarrhea, nausea, back pain, and arthralgia. This risk-balancing information should be presented in a manner that is reasonably comparable in prominence and readability as the presentation of information relating to the effectiveness of the drug.

In order to address these objections, DDMAC requests that NNPI immediately cease its use of this, and all other promotional materials for Prandin that contain the same or similar violations. NNPI should respond in writing by August 13, 1998. This response should include a list of all similarly violative material and a description of NNPI's method of discontinuing their use.

If NNPI has any questions or comments, please contact the undersigned by facsimile at (301) 594-6771, or at the Food and Drug Administration, Division of Drug Marketing, Advertising and Communications, HFD-40, Rm 17B-20, 5600 Fishers Lane, Rockville, MD 20857. DDMAC reminds you that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID #6913 in addition to the NDA number.

Sincerely,

Mark W. Askine, R.Ph.
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications