DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

F.O.I

NOV 23 1998

Transmitted Via Facsimile

Kathleen J. Day
Director
Regulatory Affairs-Labeling and Promotion
Pharmacia & UpJohn, Inc.
7000 Portage Road
Kalamazoo, Michigan 49001-0199

RE: NDA 20-597
Xalatan (latanoprost solution) Sterile Ophthalmic Solution 0.005%
MACMIS ID# 7268

Dear Ms. Day:

This letter is in reference to Pharmacia & UpJohn, Inc.'s (Pharmacia) promotional materials for Xalatan (latanoprost solution) Sterile Ophthalmic Solution 0.005%. The Division of Drug Marketing, Advertising and Communications (DDMAC), through its surveillance activities, has identified a brochure identified as 8364-65 and has concluded that it is false and/or misleading under the Federal Food, Drug, and Cosmetic Act and its implementing regulations. Our specific objections follow:

Second-line Therapy

In the brochure, Pharmacia claims that Xalatan is "powerful monotherapy" and Xalatan is the "foundation for use as monotherapy in appropriate patients." DDMAC considers these claims to promote Xalatan as a first-line therapy which constitutes the promotion of an unapproved use for Xalatan. Although Pharmacia has included the indication for Xalatan, "the reduction of elevated intraocular pressure (IOP) in patients with open-angle glaucoma and ocular hypertension who are intolerant of other IOP-lowering medications or insufficiently responsive (failed to achieve target IOP determined after multiple measurements over time) to another IOP lowering medication," at the bottom of the cover and on each spread in small type, the presentation of the promotional claims negate the presentation of the full, second-line indication.

Fair Balance

On page five of the brochure, Pharmacia claims that Xalatan has "no cardiopulmonary contraindications." DDMAC considers this statement to be misleading because it is lacking context that, although the drug has no cardiopulmonary contraindications, it has

a bolded warning regarding changes to pigmented tissues[1]. Pharmacia's only disclosure of this warning is the statement that Xalatan "may gradually change eye color." This statement is inadequate to disclose that there may be a permanent change in the pigment of irises and periorbital tissues, and may change the length, thickness, pigmentation, and number of eyelashes.

Misleading Claim of Efficacy

In the brochure, Pharmacia claims that Xalatan provides for an "IOP reduction ranging from 27% to 35% after only 6 months." DDMAC considers this claim to be misleading because it is inconsistent with the approved product labeling that states that the IOP lowering effect of Xalatan at 6 months was 6-8 mmHg from patient baselines of 24-25 mmHg (e.g., a 24-33% reduction).

Powerful

In the brochure, Pharmacia states that Xalatan is "a powerful direction for IOP control," "powerful long-term IOP control," "powerful monotherapy," "Xalatan-a powerful therapy for glaucoma patients," and "powerful enough to be used as monotherapy in appropriate patients." These claims are misleading because the term "powerful" implies a higher degree of efficacy for the drug than has been demonstrated by substantial evidence (i.e., adequate and well-controlled clinical trials).

Pharmacia should immediately cease the dissemination of this violative brochure and all similar promotional materials that make these or similar claims.

Pharmacia's written response should include Pharmacia's intent to comply with the above request and should be received by DDMAC by December 8, 1998. Pharmacia should also include the date that it ceased disseminating these promotional materials.

Please direct your correspondence to me by facsimile at (301) 594-6771, or by written communication at the Division of Drug Marketing, Advertising, and Communications, HFD-40; Room 17B-20; 5600 Fishers Lane; Rockville, MD 20857.

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1 DDMAC notes that Pharmacia is inconsistent in its presentation in promotional materials of the disclosure regarding changes in pigmented tissues. For example, the warning is prominently included in brochure 8364-79, is presented on the back page in journal ad USJ1708.00, and is not presented in brochure 8364-65.

In all future correspondence regarding this matter, please refer to MACMIS # 7268 and NDA 20-408.

Sincerely,

Warren F. Rumble
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communication