DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

JAN 18 2001

TRANSMITTED VIA FACSIMILE

Thomas F. Willer, Ph.D.
Associate Director, Regulatory Affairs
Hospital Products Division
Abbott Laboratories
D-389, Bldg. AP30
200 Abbott Park Road
Abbott Park, Illinois 60064-6157

RE: NDA 20-098
Mivacron (mivacurium chloride) Injection
MACMIS ID # 9426

Dear Dr. Willer:

We refer to Abbott Laboratories' (Abbott) submission, dated November 11, 2000, of promotional material under cover of Form FDA 2253 for Mivacron (mivacurium chloride) Injection. This submission included a professional sales aid, identified as 00-7337. The Division of Drug Marketing, Advertising, and Communications (DDMAC) has reviewed this professional sales aid and has concluded that it is in violation of the Federal Food, Drug, and Cosmetic Act and its implementing regulations. Our specific objections follow:

Misleading Efficacy Claims

- You present the claim, "Mivacron is the only short-acting, nondepolarizing NMB [neuromuscular blocker] with an established safety profile." This claim is misleading because it suggests that Mivacron is the only safe short-acting, nondepolarizing NMB. However, Raplon (rapacuronium bromide) for Injection is also a nondepolarizing NMB that has a short duration of clinical action.

- The claim, " [Mivacron] Ensures confidence of administration even in patients with significant cardiovascular disease," is misleading because it minimizes the risk of using Mivacron in patients with significant cardiovascular disease. Specifically, the Precautions section of the PI states, "Caution should be exercised in administering Mivacron to patients with clinically significant cardiovascular disease and patients with any history suggesting a greater sensitivity to the release of histamine or related mediators (e.g. asthma)." Furthermore, cardiovascular disease is a condition that warrants a Mivacron dosage adjustment. Specifically, the PI states, "the initial dose of Mivacron should be 0.15 mg/kg or

less, administered over 60 seconds and assurance of adequate hydration and careful monitoring of hemodynamic status are important."

Fair Balance

- In general, claims for a drug should be accompanied by information about the most serious and the most common adverse events associated with the use of the drug. Although you present numerous claims for Mivacron in your sales aid, you fail to present any risk information other than the disclosure of the single most common adverse event. Therefore, this sales aid lacks fair balance because important risk information is omitted.

In order to address these violations, you should immediately cease distribution of this and other similar promotional materials for Mivacron that contain the same or similar messages. You should submit a written response to us on or before February 1, 2001, describing your intent to comply with the above.

You should direct your response to me by facsimile at (301) 594-6771, or in writing at the Food and Drug Administration, Division of Drug Marketing, Advertising and Communications, HFD-42, Rm. 17B-20, 5600 Fishers Lane, Rockville, MD 20857. We remind you that only written communications are considered official.

Sincerely,

/S/

Spencer Salis, Pharm.D.
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications

.ıort-acting, nondepolarizing NMB

Mivacron® Injection
(mivacurium chloride)

A *short*-acting NMB that's *long* on safety

MIVACRON is the only short-acting, nondepolarizing NMB with an established safety profile.

Clinical benefits of MIVACRON:

Hemodynamic stability

- Expect clinically insignificant histamine release with proper dosing[1]
- Ensures confidence of administration even in patients with significant cardiovascular disease[1]
  - -- Patients with significant CV disease showed no clinically important changes in mean arterial pressure or heart rate[1]
- Has no clinically significant effects on heart rate[1]
- Only *minimal* changes in mean arterial pressure or heart rate were noted when used in children (2–12 years old)[1]

Established safety

- Established track record of safety over 8 years of clinical use[2]
- Offers a rapid spontaneous recovery profile[1]
- Demonstrates a low-risk side-effect profile[1]
- Noncumulative properties provide less risk of prolonged recovery time with maintenance dosing and continuous infusion[1]
- Has no metabolites with clinically significant neuromuscular, cardiovascular, or autonomic effects[1]

MIVACRON offers convenient administration with *no special handling* requirements

-- *No reconstitution* -- *No refrigeration* -- *Rapid spontaneous recovery profile*[1] --

The most commonly reported adverse reaction in clinical trials was flushing (16%).

For additional information on MIVACRON, please consult full Prescribing Information, contact your local sales representative, or call 1-800-222-6883.

References

1. Mivacron complete Prescribing Information, Abbott Laboratories Inc.
2. Approved Drug Products with Therapeutic Equivalence Evaluations. FDA/Center for Drug Evaluation and Research, 1999. Available at:http://www.fda.gov/cder/ob/docs/preface/ectablec19.htm. Accessed March 14, 2000.

Abbott Laboratories
Hospital Products Division
Abbott Park, IL 60064

NOT TO BE LEFT WITH CLINICIAN.