DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

FEB 12 1999

TRANSMITTED VIA FACSIMILE

Tracie A. Parker
Manager, Regulatory Operations
PAREXEL International Corporation
1400 N. Providence Road, Suite 2000
Media, PA 19063

RE:

Chirocaine (levobupivacaine injection)
MACMIS ID #7618

Dear Ms. Parker:

As part of its routine monitoring and surveillance activities, the Division of Drug Marketing, Advertising, and Communications (DDMAC) has become aware of a press release for Chirocaine, disseminated by or on behalf of Chiroscience Group, plc (Chiroscience), that is in violation of the Federal Food, Drug, and Cosmetic Act (the Act) and its implementing regulations. DDMAC specifically refers to the press release issued on January 12, 1999, entitled "Positive Recommendations From FDA Advisory Committee on Chirocaine." This press release is considered promotional labeling for Chirocaine and is in violation of the Act for the following reasons.

Pre-Approval Promotion

Section 21 CFR 312.7 states, among other things, that an investigational new drug may not be promoted as being safe or effective for the uses under investigation. The press release in question is considered to be violative because it promotes the safety and efficacy of Chirocaine, an investigational new drug. These claims include statements about Chirocaine's intended use in anesthesia and other conclusions about the safety and efficacy of the drug such as:

"The pre-clinical data submitted by Chiroscience showed an advantageous cardiac and central nervous system toxicity profile for Chirocaine over bupivacaine. Furthermore, the clinical pharmacology data also demonstrated differences in cardiac toxicity between these two drugs. Therefore, the Committee recommended to the FDA that Chirocaine need not carry a 'black boxed' warning once approved."

"Dr. John Padfield, Chief Executive of Chiroscience Group plc commented...We remain hopeful that the label will allow us to demonstrate a clear advantage over the market leader...Today's

review by the Advisory Committee supports our contention that Chirocaine is an important addition to the range of drugs used in anesthesia and pain."

"Pre-clinical studies have shown that Chirocaine is as potent as bupivacaine, but has a superior safety profile in its action on the heart and central nervous system."

"Its efficacy and safety profile have been confirmed in over 25 clinical trials...."

"When compared to general anesthesia, local anesthesia has the potential for improved patient outcome as it is faster, providing a less painful recovery, minimizing hospital costs by reducing hospital stays and decreasing the risk of post-operative infection."

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

1. Immediately discontinue the use of this, and all other promotional materials for Chirocaine that contain the same or similar violations.

2. Provide to DDMAC, in writing, Chiroscience's intent to comply with #1 above. Your response should be received by February 26, 1999.

3. This response should include a list of all similarly violative promotional materials and Chiroscience's method for discontinuing their use.

If Chiroscience 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 Chiroscience that only written communications are considered official.

In all future correspondence regarding this particular matter, please refer to MACMIS ID #7618 in addition to the IND number.

Sincerely,

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