DEPARTMENT OF HEALTH & HUMAN SERVICES
FOI
Public Health Service

Food and Drug Administration
Rockville MD 20857

JAN 23 1997

TRANSMITTED VIA FACSIMILE

Edward L. Zimney, M.D.
Director, Medical Regulatory Affairs
Immunex Corporation
51 University Street
Seattle, Washington 98101

RE: NDA 19-297/S-014
Novantrone (mitoxantrone)
MACMIS #5073

Dear Dr. Zimney:

Reference is made to promotional materials submitted by Immunex Corporation (Immunex) under cover of FDA Form 2253, dated January 7, 1997. The Division of Drug Marketing, Advertising and Communications (DDMAC) has reviewed these materials for Novantrone, and have determined that they promote Novantrone in a manner in violation of the Federal Food, Drug and Cosmetic Act. Specifically we refer to a sales aid [SA072-00-NOV] and reprint carrier [SA076-00-NOV] used to promote Novantrone for advanced hormone-refractory prostate cancer (HRPC). Our specific objections are outlined below.

1. Failure to provide fair balance

Promotional materials should present information about the risks associated with the use of the product in a manner reasonably comparable to that of claims about the drug. The sales aid and reprint carrier contain no fair balance information. The only mention of adverse events is in the context of safety claims. There is insufficient information on the risks associated with the use of Novantrone to balance the many claims of safety and effectiveness, and therefore these materials are lacking in fair balance.

Immunex claims that Novantrone is "generally well-tolerated." This claim would be misleading, because it minimizes the severity of toxicities associated with the use of Novantrone as described in the approved product labeling.

Furthermore, in the claims, "Low incidence of neutropenic fever" and "Minimal thrombocytopenia" the frequency of these adverse events is presented as percent of cycles in which the adverse event was recorded. This presentation is misleading and inconsistent with the approved product labeling. The Novantrone product labeling describes adverse event rates

by number of patients experiencing the event. A presentation as percent of cycles in which the event occurs minimizes the actual frequency of the adverse events, is likely to be less meaningful to health care practitioners, and is misleading.

2. **Unsubstantiated survival claims**

The front cover of the sales aid presents the following series of claims:

> Presenting Novantrone
> It's about the 113 men who will die each day of HRPC.
> It's about the pain they must endure.
> It's about a powerful, new therapeutic option.
> It's about time.

These claims suggest that Novantrone will have an effect on the number of men who die from HRPC. There is no evidence to demonstrate that Novantrone has any effect on mortality in advanced HRPC. Furthermore, these claims suggest that Novantrone is the first treatment shown to relieve the pain of advanced HRPC, when this is not the case. Therefore, this presentation is false and/or misleading.

3. **Unsubstantiated quality of life claims**

Immunex uses the claim, "The power to enhance lives", as a tagline and headline. This claim suggests that the use of Novantrone will enhance or improve the overall quality of patients' lives. This claim is false and/or misleading because it is unsupported by Novantrone approved product labeling or substantial evidence.

Immunex should immediately cease distribution and use of these and other similar promotional materials for Novantrone that contain the same or similar claims and representations. Immunex should notify DDMAC of its intent and plans to comply with the above. Please respond by February 6, 1997, addressing your response to the undersigned at the Division of Drug Marketing, Advertising and Communications, 5600 Fishers Lane, HFD-40, Rockville, Maryland 20857. DDMAC reminds Immunex that only written communications are considered official.

In all correspondence regarding this particular issue, please refer to MACMIS ID#5073 in addition to the NDA number.

Sincerely,

Tracy L. Acker, Pharm.D.
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications

File Name:novantrone\NOVSALES.AID

Drafted: Acker 1/10/97
Concur w/comment:Abrams 1/13/97
Revised: Acker 1/23/97

CC:
HFD-40/19-297
HFD-40/Chron/Acker/Abrams
HFD-150/Vaccari/Beitz

MACMIS ID # 5073

MACMIS Type Code:LETT
MACMIS Action Code:VIOL

2253 ID #47986 Material ID #SA07200NOV
2253 ID #47980 Material ID #SA07600NOV

Due Date: February 6, 1997

Close Out: No

FOI status: RELEASABLE