DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

TRANSMITTED VIA FACSIMILE

APR 19 1999

Dori L. Glassner
Manager, Regulatory Affairs
Organon Inc.
375 Mt. Pleasant Avenue
West Orange, NJ 07052

RE: NDA 20-214
Zemuron (rocuronium bromide)
MACMIS ID #7876

Dear Ms. Glassner:

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 for Zemuron (rocuronium bromide), disseminated by Organon Inc. (Organon), that is in violation of the Federal Food, Drug, and Cosmetic Act (Act) and its implementing regulations. DDMAC specifically refers to the professional journal advertisement for Zemuron, identified as ORG-43931, that appears in the April, 1999, issue of *Anesthesiology*. DDMAC has reviewed this journal advertisement and finds it to be in violation of the Act for the following reason:

Lack of Fair Balance

Promotional materials are in violation of the Act if they fail to present information relating to side effects, contraindications, and other risk information with a prominence and readability reasonable comparable with the presentation of information relating to effectiveness of the drug, taking into account all implementing factors such as typography, layout, white space, and other techniques apt to achieve emphasis. The important risk information concerning Zemuron in the journal advertisement is presented by Organon as footnotes that are extremely difficult to read due to the very small typeface used. Organon's presentation of risk information in this manner minimizes the importance of this information. For example, the journal advertisement includes the prominent claim that Zemuron is indicated for rapid-sequence intubation. However, the approved product labeling (PI) for Zemuron states that the drug is not recommended for rapid-sequence induction in cesarean section patients. This important risk information is minimized by its presentation as a footnote in type size that is readable only upon close inspection.

Omission of Material Facts

The journal advertisement is misleading because it omits important risk information concerning Zemuron. For example, the journal advertisement includes the prominent claim that Zemuron may be used in the intensive care unit (ICU). However, the PI includes a precaution that Zemuron has not been studied for long-term use in the ICU, and an apparent tolerance to Zemuron may develop during chronic administration in the ICU. The PI states, therefore, that Zemuron should only be used for long-term use in the ICU if, in the opinion of the prescribing physician, the specific advantages of the drug outweigh the risks. This risk information is not presented at all in Organon's journal advertisement. Moreover, the PI states that Zemuron should be used with caution in patients with clinically significant hepatic disease. This caution is also not disclosed in the journal ad.

Misleading Comparative Claims

"THE LEADING NEUROMUSCULAR BLOCKING AGENT ON THE MARKET"
"ZEMURON provides advantages at both critical stages of anesthesia..."

These claims are misleading because they suggest that Zemuron is superior to other neuromuscular blocking agents when such has not been demonstrated by substantial evidence.

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

1. Immediately discontinue the use of these, and all other promotional materials for Zemuron that are lacking in fair balance.

2. Provide to DDMAC, in writing, Organon's intent to comply with #1 above. Your response should be received by May 3, 1999.

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

If you have 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 #7876 in addition to the NDA number.

Sincerely,

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