Joint Meeting of the Nonprescription Drugs and the Endocrinologic & Metabolic Drugs Advisory Committee
January 23, 2006

This is the final report of the Nonprescription Drugs Advisory Committee Meeting held on January 23, 2006. A verbatim transcript will be available in about 2 weeks, sent to the Division and posted on the FDA website at http://www.fda.gov/ohrms/dockets/ac/cder05.html#NonprescriptionDrugs

All external requests for the meeting transcripts should be submitted to the CDER Freedom of Information office.

The Nonprescription Drugs and the Endocrinologic & Metabolic Drugs Advisory Committee of the Food and Drug Administration, Center for Drug Evaluation and Research, met on January 23, 2006, at the Holiday Inn Select Bethesda, the Ballrooms, 8120 Wisconsin Avenue, Bethesda, Maryland. Alastair Wood, M.D. chaired the meeting. There were approximately 250 in attendance.

Nonprescription Drugs Advisory Committee (voting):
Alastair Wood, M.D. (Chair), Neal Benowitz, M.D., Terrence F. Blaschke, M.D., Ernest B. Clyburn, M.D., Ruth M. Parker, M.D., Wayne R. Snodgrass, M.D., Ph.D., Mary E. Tinetti, M.D.

Nonprescription Drugs Advisory Committee (absent)
Jack E. Fincham, Ph.D., Robert E. Taylor, M.D., Ph.D., F.A.C.P.

Endocrinologic & Metabolic Drugs Advisory Committee (voting):
Sonia Caprio, M.D., Thomas O. Carpenter, M.D., Dean A. Follmann, Ph.D., Morris Schambelan, M.D., Paul D. Wollf, M.D.,

Endocrinologic & Metabolic Drugs Advisory Committee (absent):
Nelson B. Watts, M.D. (Chair), David S. Schade, M.D., Michael R. McClung, M.D., Jorge Plutzky, M.D., Margaret E. Wierman, M.D.,

Consultants (voting):
Marie R. Griffin, M.D., Sonia Patten, Ph.D. [CR], Melanie G. Coffin [PR],

Industry Representative (non-voting):
George S. Goldstein, M.D., Steven W. Ryder, M.D.

FDA Speakers:
Andrea Leonard Segal, M.D., Eric Coleman, M.D., Arlene Solbeck, M.S., Julie Golden, M.D., Susanna Weiss, Ph.D., J.D., Karen Feibus, M.D.

FDA Participants:
Charles Ganley, M.D., Curt Rosenbraugh, M.D., Andrea Leonard Segal, M.D., Mary H. Parks, M.D., Eric Coleman, M.D., Arlene Solbeck, M.S., Julie Golden, M.D., Susanna Weiss, Ph.D., J.D., Karen Feibus, M.D.

Open Public Hearing Speakers:
Dr Sidney M. Wolf, Public Citizen's Health Research Group
Steve Simenson, American Pharmacists Association
Deborah Fisher, Self-Interest
Laurie Tansman, Mt Sinai NYU Health
Morgan Downey, American Obesity Association
Dr Robert Berowitz, NAASO
Dr Nathaniel G. Clark, American Diabetes Association
Jennifer Weber, American Dietetic Association

John P. Foreyt, Baylor College of Medicine
Dr Valentine Burrough, National Medical Association
Alex Perez, Self-Interest

On January 23, 2006, the committees considered the safety and efficacy of new drug application (NDA) 21-887, proposing over-the-counter (OTC) use of Orlistat (tetrahydrolipstatin) 60 milligram (mg) capsules, GlaxoSmithKline Consumer Healthcare, L.P., to promote weight loss in overweight adults when used along with a reduced calorie and low fat diet.

Alastair Wood, M.D. (Committee Chair), called the meeting to order at 8:00 a.m. The Committee members, consultants, and FDA participants introduced themselves. The conflict of interest statement was read into the record by Darrell Lyons B.S.N. The agenda proceeded as follows:

Call to Order	Alastair Wood, M.D., Ph.D. Chair, Nonprescription Drugs Advisory Committee, NDAC
Conflict of Interest Statement	LT Darrell Lyons, B.S.N Executive Secretary, NDAC
Welcome and Introductory Comments	Andrea Leonard Segal, M.D. Acting Director, Division of Nonprescription Clinical Evaluation
History of Weight-Loss Drugs	Eric Colman, M.D. Medical Team Leader, Division of Metabolism and Endocrinology Products
History of the OTC Monograph	Arlene Solbeck, M.S. Senior Regulatory Review Scientist, Division of Nonprescription Regulation Development
Orlistat for Over-the-Counter Use	John Dent, Ph.D. Senior Vice-President, Research & Development GlaxoSmithKline
The Public Health Need for FDA-Approved Weight Loss Tool	Caroline Apovian, M.D. Associate Professor of Medicine and Pediatrics, Boston University School of Medicine Director, Center for Nutrition and Weight Management, Boston Medical Center Co-Principal, New England Centers for Obesity Res & Ed Vice-Chair, Massachusetts Med Soc Committee on Nutrition
Safety and Efficacy-Orlistat 60-120 mg	Vidhu Bansal, Pharm.D. Director, Medical Affairs; GlaxoSmithKline

Consumer Understanding and Use in OTC Setting	Saul Shiffman, Ph.D. Research Professor of Health Psychology and Pharmaceutical Sciences University of Pittsburgh
Orlistat's Consumer Education and Behavioral Support Program	Steve Burton Vice-President of Weight Control GlaxoSmithKline
Summary and Commitments	John Dent, Ph.D. Senior Vice-President, Research & Development GlaxoSmithKline

FDA Presentations:

Safety and Efficacy Review	Julie Golden, M.D. Medical Officer, Division of Metabolism and Endocrinology Products
Label Comprehension Review	Susanna Weiss, Ph.D., J.D. Social Science Analyst, Division of Nonprescription Clinical Evaluation
Actual Use Study Review	Karen Feibus, M.D. Medical Officer, Division of Nonprescription Clinical Evaluation

Open Public Hearing Presentations

Questions to the Committee:

1. **Has clinical effectiveness been demonstrated with Orlistat 60 mg tid and 120 mg tid in the nonprescription setting? For each of these doses, please comment on the following:**
   - **a. A 6-month duration of use**
   - **b. Repeated use or chronic use**
   - **c. Use in the overweight individual**
   - **d. Use in the obese individual (with and without multiple co-morbid conditions)**
   - **e. Use with the proposed educational materials**

   a. Yes: 15
   No: 0
   Abstain: 0

   b. Question was dismissed due to lack clinical data in nonprescription setting presented on repeated use.

   c. This question was divided into two groups; overweight individuals with: (1.) BMI of 25-28 and (2.) individuals with a BMI of 28-29.9.

   C1.
   a. Yes: 9
   b. No: 5
   c. Abstain: 1

   C2.
   a. Yes: 15
   b. No: 0
   c. Abstain: 0

d. Yes: 15
No: 0
Abstain: 0

Discussion: The committee's vote above reflects that the data presented on patient without co-morbid conditions. Since the data presented excluded patients with co-morbid conditions the committee could not vote on that topic. (See Transcript for Comments on Patients with Co-Morbid Conditions).

2. **Are the safety and tolerability characteristics of Orlistat 60 mg -120 mg tid acceptable for a nonprescription drug? Specifically comment on the following safety concerns and the ability of labeling to convey these concerns to the consumer.**
   a. **Fat-soluble vitamins**
   b. **Drug-drug interactions (specifically, cyclosporine and warfarin)**
   c. **Other concerns? (e.g., pancreatitis, liver toxicity, lithogenicity)**

   Yes: 12
   No: 3
   Abstain: 0

   Discussion:
   See Transcript for complete discussion

3. **This proposed nonprescription product is targeted for overweight adult's ≥ 18 yrs of age. Do you have specific concerns regarding possible use in the following populations?**
   a. **Pediatric patients**
   b. **Underweight or normal-weight individuals or in those with eating disorders**
   c. **Obese individuals (with and without multiple co-morbid conditions)**

   Discussion:
   FDA requested that the committee would discuss the adequacy of labeling presented, specifically, what mechanisms could be instituted that would discourage use of Orlistat in the above population and the possible adversities if used. The Committee agreed that labels should clearly state product is not for use in individuals under the age of 18 and individuals with normal weight or eating disorders. The committee further recommended implementing a plan that would require the sponsor to provide usage data in these populations and revisit the issue recommending alternative strategies if necessary. *(See Transcript for Complete Discussion)*

4. **Based on data from the label comprehension study, did subjects demonstrate adequate comprehension to support safe and effective use of Orlistat by consumers? Please describe the factors or data you considered in making your decision.**
   Yes: 13
   No: 1
   Abstain: 0
   Absent members: 1

   Discussion: *See Transcript for Complete Discussion*

5. **Do the results from the actual use study suggest:**
   a. **That consumers make correct self-selection/de-selection decisions?**
      Yes: 7
      No: 7
      Abstain:
      Absent members: 1

   b. **That consumers comply with dosing directions?**
      Yes: 13
      No: 1
      Abstain: 0
      Absent members: 1

6. Do you believe that the potential benefits of nonprescription Orlistat outweigh the risks?

Yes: 11
No: 3
Abstain: 0
Absent member: 1

7. Should Orlistat be approved for nonprescription use?

a. If no, please discuss the deficiencies of the clinical program.

b. If yes, is the adult population for which orlistat is targeted in the prescription setting different from the adult population in the nonprescription setting? If so, how would each of the two populations be identified?

Yes: 11
No: 3
Abstain: 0
Absent member: 1

(See Transcript for yes/no comments)

The meeting was adjourned at approximately 6:20 p.m. on January 23, 2006.

These summary minutes for the January 23, 2006 Meeting of the Nonprescription Drugs and the Endocrinologic and Metabolic Drugs Advisory Committee of the Food and Drug Administration were approved on January 27, 2006.

I certify that I attended the January 23, 2006, Meeting of the Nonprescription Drugs and the Endocrinologic and Metabolic Drugs Advisory Committee of the Food and Drug Administration meeting and that these minutes accurately reflect what transpired.

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Darrell Lyons, B.S.N.
Executive Secretary

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Alastair Wood, M.D.
Chair