DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

FOI

Food and Drug Administration
Rockville MD 20857

MAR 17 1997

TRANSMITTED VIA FACSIMILE

David T. Guzek
Director, Regulatory Administration
Hospital Products Division
Abbott Laboratories
D-389, Building AP30
200 Abbott Park Road
Abbott Park, Illinois 60064-3537

RE: **NDA# 20-478**
Ultane (sevoflurane)
MACMIS ID #4912

Dear Mr. Guzek:

Reference is made to Abbott Laboratories' (Abbott) advertisement (96-4376) for Ultane (sevoflurane) that appeared in the October, 1996 issue of *Anesthesiology*. The Division of Drug Marketing, Advertising, and Communications (DDMAC) has determined that this advertisement is in violation of the Federal Food, Drug, and Cosmetic Act (the Act) and the applicable regulations.

Specifically, DDMAC objects to the following:

1. The claim that "IN EVERY PATIENT...YOU'LL FIND ANOTHER CRITICAL REASON TO CHOOSE ULTANE (sevoflurane)"

The "In every patient..." claim is false and misleading because several patient populations are or may be at risk with the use of Ultane. Specifically, as stated in the approved labeling (PI), "Ultane should not be used in patients with known history of sensitivity to sevoflurane or to other halogenated agents." The WARNINGS section of the PI states "Because clinical experience in administering sevoflurane to patients with renal insufficiency (creatinine > 1.5 mg/dL) is limited, it's safety in these patients has not been established." Further, the PRECAUTIONS section of the PI indicates "...patients with severe hepatic dysfunction were not investigated.""...there are no adequate and well-controlled studies in pregnant women.", and "the safety of sevoflurane in labor and delivery has not been demonstrated."

2. The claim that "IN EVERY PROCEDURE...YOU'LL FIND ANOTHER CRITICAL REASON TO CHOOSE ULTANE (sevoflurane)"

The statement "In every procedure..." is false and misleading because the use of Ultane is not recommended in procedures requiring fresh gas flow rates below 2L/min in a circle absorber system. Further, with the warning in the approved labeling for patients with renal insufficiency, procedures such as renal transplantation and living donor harvest would carry risk to the patient.

3. The claim that Ultane is "The only smooth, rapid, and predictable choice" is false and misleading because it is an unsubstantiated superiority claim. There are other induction and maintenance agents available with smooth, rapid, and predictable profiles.

4. The claim "Faster elimination for significantly faster emergence" is misleading because it implies that Ultane has a faster elimination profile than all other marketed products in its class. The PI for Ultane states " ...rate of elimination of sevoflurane was similar compared to desflurane, but faster compared with either halothane or isoflurane."

5. This advertisement is lacking in fair balance because it fails to give any emphasis to information on side effects and contraindications in comparison to claims of effectiveness.

6. DDMAC has no record that Abbott submitted this promotional labeling at the time of initial dissemination under Form FDA 2253. Such submissions are required by 21 C.F.R. 314.81 (b) (3) (i).

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

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

2. Provide to DDMAC, in writing, Abbott's intent to comply with #1 above. Abbott's response should be received by March 27, 1997.

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

If Abbott 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 Abbott that only written communications are considered official.

In all future correspondence regarding this particular matter please refer to MACMIS ID #4912 in addition to the NDA number.

Sincerely,

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

File Name: ultaneno.let

Consult: Landow	Date: 3/12/97
Drafted: Askine	Date: 3/13/97
Comment: Stockbridge	Date: 3/13/97
Revised: Askine	Date: 3/13/97
Concur: Palmer	Date: 3/14/97

CC:
HFD-40/NDA # 20-478
HFD-40/Chron/Askine/Palmer
HFD-170/Landow
HFD-170/NDA # 20-478

MACMIS ID #

MACMIS Type Code:LETT
MACMIS Action Code:VIOL

Due Date: March 27, 1997

Close Out: NO

FOI Status: Releasable