DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

TRANSMITTED VIA FACSIMILE

SEP 22 1999

Carl M. DeJuliis, MS, RPh
Regulatory Manager
Regulatory Affairs
Pharmacia & Upjohn
7000 Portage Road
Kalamazoo, MI 49001-0199

RE: NDA # 50-767
Cleocin Vaginal Ovules
(clindamycin phosphate vaginal suppository)
MACMIS ID # 8191

Dear Mr. DeJuliis:

The Division of Drug Marketing, Advertising, and Communications (DDMAC), as part of its routine monitoring and surveillance program, has reviewed a press release issued by Pharmacia & Upjohn (P&U) on August 16, 1999, for Cleocin Vaginal Ovules. DDMAC has determined that this press release is misleading in violation of the Federal, Food, Drug, and Cosmetic Act (the Act) and its implementing regulations.

Specifically, DDMAC objects to the following:

Indication

The press release is misleading because the discussion regarding the use of Cleocin Vaginal Ovules is incomplete. Specifically, the press release states the condition that Cleocin Vaginal Ovules is indicated to treat, i.e., bacterial vaginosis in non-pregnant women, but fails to include the "Note" information that is part of the "Indications and Usage" section of the approved product labeling (PI). Cleocin Vaginal Ovules' "Note" information contains material facts regarding the clinical diagnosis of bacterial vaginosis, and the information that other pathogens commonly associated with vulvovaginitis, e.g., *Trichomonas vaginalis, Chlamydia trachomatis, Neisseria gonorrhoeae, Candida albicans*, and herpes simplex virus, should be ruled out. The "Note" is an integral part of

the clinical indication for the appropriate use of Cleocin Vaginal Ovules and should be included in discussions regarding the use of this drug.

Superiority Claim

- **"Now health care practitioners can prescribe intravaginal clindamycin in ovule form to help enhance patient care and improve overall treatment compliance."**

  The above statement is misleading because it makes an implied superiority claim without substantiation. Specifically, the statement implies that, prior to the approval of Cleocin Vaginal Ovules, patient care and overall treatment compliance was a problem with other products used to treat bacterial vaginosis. The clinical studies used as the basis of approval were not designed to measure whether patient care and overall treatment compliance were better with Cleocin Vaginal Ovules versus the comparator products.

Failure to Provide Fair Balance

The press release is lacking in fair balance because it fails to include adequate information about the risks associated with the use of Cleocin Vaginal Ovules. The press release includes effectiveness claims, a contraindication statement, and the most common adverse events associated with the use of Cleocin Vaginal Ovules, but fails to include important bolded information from the Warning Section of the PI regarding pseudomembranous colitis. Although Cleocin Vaginal Ovules are administered by the vaginal route, approximately 30% of the clindamycin dose is systemically absorbed from the vagina. Therefore, pseudomembranous colitis should be considered in patients who present with diarrhea subsequent to using Cleocin Vaginal Ovules. DDMAC notes that the press release states that Cleocin Vaginal Ovules is contraindicated in patients with a history of "antibiotic associated colitis." However, this product can cause antibiotic colitis (i.e., pseudomembranous colitis) in patients who have not previously experienced this condition.

In order to address these violations, DDMAC recommends that P & U take the following actions:

1. Immediately discontinue the use of the aforementioned material and any other promotional materials for Cleocin Vaginal Ovules that contain the same or similar violations, and
2. Provide a written response to DDMAC of your intent to comply with the above request.

P& U's response should be received no later than 10 business days from the issue date of this letter. If P&U 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 P&U that only written communications are considered official. In all future correspondence regarding this particular matter, please refer to MACMIS ID # 8191 in addition to the NDA number.

Sincerely.

JoAnn Spearmon, Pharm.D., M.P.A.
Regulatory Review Officer
Division of Drug Marketing,
Advertising, and Communications