DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Rockville MD 20857

FEB 15 2000

NADA 141-038

Ms. Barbara Goulding
Supervisor, Regulatory Affairs
Luitpold Pharmaceuticals
One Luitpold Drive
Shirley, New York 11967

Dear Ms. Goulding:

This letter is in reference to Luitpold Pharmaceuticals' Technical Bulletin (identified as AHD 2419) for Adequan® Canine, NADA 141-038, which was collected from the Luitpold Pharmaceuticals display booth at the North American Veterinary Conference in Orlando, FL, January 15-19, 2000. This promotional piece is considered to be labeling as defined under 21 C.F.R. §202.1(l)(2).

This is the third promotional item since September 1999 (refer to previous letters dated 9/3/99 and 12/17/99), concerning the violative promotion of Adequan® Canine (a polysulfated glycosaminoglycan). According to the approved professional labeling, the "**Indications and Usage**" are: *Adequan® Canine is recommended for intramuscular injection for the control of signs associated with non-infectious degenerative and/or traumatic arthritis of canine synovial joints.* Additionally, the "**Pharmacology**" section of the approved professional labeling reads, in part: *The specific mechanism of action of Adequan® in canine joints is not known.*

In the bulletin however, Luitpold Pharmaceuticals attempts to explain how Adequan® Canine works. The following statements are used: "*reduces inflammation and relieves pain by inhibition of prostaglandin synthesis and toxic oxygen radical production*"; "*inhibits the enzymes which degrade hyaluronate and components of articular cartilage*"; "*stimulates the production of new articular cartilage components thus favoring the repair of damaged articular cartilage*"; and "*stimulates the production of hyaluronate, which further normalizes the joint and aids lubrication.*" These words are also emphasized with the use of graphics. These mechanisms of action are based on *in vitro* data and *in vitro* data are not always indicative of clinical effectiveness. *In vitro* data used in a way to suggest that they have clinical significance when in fact no clinical significance has been demonstrated is false or misleading. These statements are therefore, deemed to be unapproved new animal drug claims. Furthermore, the statements contradict the statement in the approved professional labeling that the specific mechanism of action of Adequan® in canine joints is not known. The unapproved drug claims and false or misleading statements in your labeling (Technical Bulletin) causes your product to be adulterated under Section 501(a)(5) and misbranded under 502(a) of the Act.

Also, the labeling piece is lacking in fair balance or otherwise misleading because it fails to present any information relating to side effects and contraindications or other risks associated with the use of Adequan® Canine to balance promotional claims about the product. For example, there is a precaution against use of Adequan® Canine in dogs with renal or hepatic impairment, and a contraindication against its use in dogs with known or suspected bleeding disorders.

We ask that the promotional piece cited in this letter, and other similar ones intended for future dissemination are immediately stopped. Please inform us of your intentions within 30 days of receipt of this letter. If you have any questions, you may contact us at (301) 827-6639.

Sincerely yours,

Mohammad I. Sharar, DVM, MSc.
Team Leader, Marketed Product Scientific
and Regulatory Review Team II, HFV-216
Division of Surveillance
Center for Veterinary Medicine