DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

DEC 29 1997

TRANSMITTED BY FACSIMILE

Mr. Timothy K. Ressler
Manager, Marketed Products
U.S. Regulatory Affairs
Wyeth-Ayerst Laboratories
P.O. Box 8299
Philadelphia, PA 19101-8299

Re: **NDA 20-227**
Normiflo (ardeparin sodium) Injection
MACMIS ID #6076

Dear Mr. Ressler:

This letter is in reference to Wyeth-Ayerst Laboratories' (Wyeth) submission of promotional materials under cover of Form FDA 2253 for Normiflo (ardeparin sodium) Injection. These materials included overheads (37922-03). The Division of Drug Marketing, Advertising, and Communications (DDMAC) regards these materials to be false and/or misleading under the Federal Food, Drug, and Cosmetic Act and regulations promulgated thereunder.

Specifically, the slide presentation of the ACCP Consensus Conference on Antithrombotic Therapy risk factors for deep vein thrombosis and pulmonary embolism on one of the overheads promotes the drug for unapproved uses. Normiflo is indicated for the prevention of deep vein thrombosis which may lead to pulmonary embolism following knee replacement surgery. The presentation of risk factors such as "major surgery" and "fractures of the pelvis, hip, or leg" make representations that ardeparin is safe and effective in these types of conditions when such has not been demonstrated by substantial evidence.

Wyeth should immediately suspend dissemination of these allegedly violative promotional materials and all similar materials. Wyeth should submit a written response to DDMAC on or before January 14, 1997, describing the steps that it has taken to ensure that the use of these materials have been suspended and that revised materials will be produced in accordance to the instructions above.

In addition, there is significant new risk information associated with the use of low molecular weight heparin (LMWH) products. Such information was communicated to Wyeth-Ayerst in a letter from the review Division of Gastrointestinal and Coagulation Drug Products. Concurrently, this information was disseminated by FDA in a Talk Paper and Public Health Advisory. All promotional materials for LMWH products should reflect this important information. Accordingly, Wyeth-Ayerst should revise its promotional materials for Normiflo at the next printing or within 30 days, whichever is sooner.

Wyeth should address any correspondence or additional questions to 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 Wyeth that only written communications are considered official.

In all future correspondence regarding this matter, please refer to MACMIS ID #6076 in addition to the NDA number.

Sincerely,

Stephen W. Sherman, MBA
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications