CENTER FOR DRUG EVALUATION AND RESEARCH APPLICATION NUMBER: NDA 19532

PHARMACOLOGY REVIEW(S)

NDA 17368, Zaroxolyn (metolozone) Tablets NDA 19532, Microx (metolozone) Tablets

SUBMISSION DATE: 29 MAY 1987

SPONSOR: Pennwalt Corporation

COMMENTS: A review of the PRECAUTIONS sections of the submitted revised labeling for the two Pennwalt metolozone products has identified the following common inadequacies:

- A. Chronic studies conducted in rats and mice were too deficicient in terms of dosing regimen, survival and numbers of animals microscopically examined, to support a conclusion of lack of evidence of oncogenic effect in these species. (See review by R. Harris of S/015 to NDA 17386.)
- B. Under <u>Pregnancy</u>, the indicated multiples of the daily human dose of metolozone need to be accompanied by the dosage and patient weight assumptions underlying their calculation.

hanlos A. Been

Charles A. Resnick, Ph.D. 04 June 1987

cc: Orig. HFN/110 HFN/110/CSO HFN/110/CResnick/6/4/87

REVIEW AND EVALUATION OF NONCLINCIAL BIOLOGIC DATA

NDA 19532

SPONSOR: Pennwalt Corporation

Rochester, New York

ORIGINAL SUBMISSION

CD&B Receipt:

DRUG: Microx (metolazone-PSF) 1/2 mg Tablet

10/08/85

INDICATION: hypertension

DOSAGE: Recommended dose is 1/2 mg once daily. Although a 1 mg dose might provide additional efficacy, labeling notes that "this increase may result in the loss of some of the benefits of Microx tablets 1/2 mg, such as the minimal effects on K, Na, Cl, Mg, cholesterol and uric acid".

IND UNDER WHICH CLINICAL INVESTIGATIONS CONDUCTED:

RELATED NDA: 17-386 (Zaroxolyn)

NONCLINICAL BIOLOGIC DATA: Sponsor references their approved NDA 17386 for Zaroxolyn (metolozone) tablets. Nonclinical study reports limited to carcinogenicity and reproductive toxicity experiments and these were submitted (at our request) May 15, 1986 as an amendment to the NDA (original receipt date was 10/4/85).

LABELING: Differs substantially from current labeling for Zaroxolyn. PRECAUTIONS subsections describing results of animal experiments will need to be reviewed. The preclinical reports needed for such review were only recently submitted by Pennwalt.

EVALUATION: Although revision of labeling may be required this should not affect approvability of the application. Microx is simply a more bioavailable form of the marketed diuretic Zaroxolyn (metolazone, Pennwalt) and there are no animal study requirements beyond what was provided for Zaroxolyn at time of its approval. We would not, therefore, object to approval of this application with the understanding that any statements regarding carcinogenicity or reproductive toxicity experiments that are not included in present labeling for Zaroxolyn, will not be included in labeling for Microx till such time that we are in a position to certify that they have been adequately documented.

/S/

Charles A. Resnick, Ph.D. 5/30/86

cc: Orig. NDA HFN-110 HFN-110/CResnick HFN-110/CSO

SUPPLEMENTAL REVIEW AND EVALUATION OF NONCLINICAL BIOLOGIC DATA

NDA 17-386 S/015

SPONSOR: PENNWALT CORPORATION

ROCHESTER, NY

SUBMISSION DATE: 4/30/86

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DRUG: ZAROXOLYN

INDICATION: HYPERTENSION

RELATED INDs/NDAs:

IND - METOLAZONE

NDA 19-532 - MICROX

RELATED CORRESPONDENCE:

P: LABELING SUPPLEMENT S/015 (4/4/83)

F: REQUEST (1/3/85) P: RESPONSE (6/4/85)

F: APPROVAL w CONTINGENCIES (8/12/85)

History: Supplement S/015 has requested approval of labeling for Zaroxolyn revised and updated in accordance with CFR 201.57 and 201.59. Previous correspondence to the sponsor dated January 3, 1985 requested additional changes to the proposed draft labeling submitted on April 4, 1983. These included a reordering of the statements in the "Pregnancy - Teratogenic Effects" subsection and inclusion of the appropriate regulatory statement in the "Nursing Mothers" subsection. The changes were incorporated in a submission of a draft labeling on June 4, 1985. The supplement was approved in the latter letter and was provided in the subject submission. In addition the sponsor provided full reports of all animal carcinogenicity and reproductive studies for Microx under NDA 19-532 on May 15, 1986. Microx is a sustained released dosage form of metolazone pending approval under NDA 19-532.

The preclinical studies submitted to NDA 17-386 have been reviewed prior to approval. The studies and dates of their original submission are appended. All reproduction studies, which support the labeling for metolazone, were reviewed by Dr. E. Fefer (2/6/73). The carcinogenicity studies with metolazone were submitted to IND and subsequently to the NDA prior to approval. Although the carcinogenicity studies were reviewed on March 13, 1973 [referenced in the review of Dr. E. Fefer (10/26/73)], the review itself is not contained in the correspondence files for either IND on NDA 17-386. It must be presumed that the review of these studies was favorable based on the summary basis for approval of NDA 17-386 signed by Dr. E. Belton on October 29, 1973.

Review: Dr. Fefer has adequately reviewed the reproduction studies of metolazone supplied by the sponsor. Upon reviewing the full reports, I concur with Dr. Fefer's conclusions. The studies are adequate for the assessment of reproductive performance, teratogenicity, and peri— and post—natal drug effects. Although a formal segment III study was not conducted the information obtained from the three generation rat study provides sufficient data to assess the impact of metolazone on the important parameters of such a study.

The carcinogenicity studies in mice and rats are inadequate for the assessment of the carcinogenic potential of the drug. The rat study in particular suffers from several design and technical flaws and an insufficient number of animals at risk to make an assessment of toxicity.

Rats of the Sprague-Dawley strain (15/sex/dose) were initiated on treatment with metolazone (2, 10, or 50 mg/kg) or vehicle at the sponsor's laboratories on 1/26/70. Drug was administered by gavage; hematology studies were done during the first 18 weeks on treatment and clinical chemistry during the second year. The design problems which rendered this study inadequate included:

- 1) Pretreatment of animals for one year under a pharmacology protocol which did not include close monitoring of the outcome of individual animals.
- 2) A significant number of animals died on study due to intubation errors and respiratory disease.
- 3) Rats were treated for 5 days per week throughout the course of the study.
- 4) Many of those animals which died on study seemed not to have been necropsied for whatever reasons.
- 5) Only 12-14 rats per treatment group (5-8 rats/sex/dose) were entered into the second year of the study and of these only 2-7 rats/sex/dose had histopathological exams at death, sacrifice or termination.

Among the few number of animals available for histopathologic examination, pituitary adenomas occurred more frequently in mid (4/6) and high dose (5/6) females than in the controls (1/6). Given the low number of animals at risk and the high prevalence rate for this type of tumor in aging female rats, no conclusions can be reached about its relationship to treatment. In an 18-month chronic rat study no increase in pituitary adenomas was observed in the treatment groups, but this study also inadequate for the assessment of tumorigenic potential of the drug for many of the same reasons mentioned above.

Fibroadenomas of the mammary gland also appeared to be slightly increased in the high dose females (3/6) relative to the controls (1/6). But again no conclusions can be reached about this finding in the carcinogenicity study.

The carcinogenicity study in albino mice (strain unspecified) was more acceptable from a design standpoint but still suffered from numerous deficiencies. Fifty animals/sex/dose were initiated on treatment with metolazone (?,10, or 50 mg/kg) but again dosing was conducted only 5 days/week. The study was conducted at the sponsor's laboratories and began on 1/21/70. Drug was administered by gavage.

Many animals died on study apparently from intubation errors and intercurrent illness although the details as to how many were not available. However, as many as 28 females in the low dose group had died by the third month of treatment. The number of animals available for histopathological examination ranged from 10-24 for the different groups which was insufficient in most cases to make an assessment of tumorigenic potential. From the available data on these limited number of animals there was no evidence of tumorigenicity with metolazone.

<u>Evaluation</u>: The reproduction studies conducted with metolazone are adequate for a presentation of results in the labeling, the carcinogenicity studies are not.

Specifically, the following changes should be made in the final printed labeling prior to approval.

Carcinogenesis, Mutagenesis, Impairment of Fertility

- 1) The first paragraph of this section should be replaced with the following statement: "Studies to adequately assess the carcinogenic potential of metolazone have not been conducted."
- 2) In the second paragraph of this section, references to studies of reproductive performance in rabbits should be deleted from the first and last sentences since no formal studies of this kind were conducted in this species
- 3) In the second paragraph, the second sentence should be modified to read: "In a rat study, in which males were treated orally with metolazone at doses of 2, 10 and 50 mg/kg (equivalent to 5, 25 and 125 times the maximum recommended human dose respectively based on 50 kg body weight for man) for 127 days prior to mating with untreated females, an increased number of resorption sites was observed in dams mated with males from the 50 mg/kg group. In addition, the fetal weight of offspring was decreased and the pregnancy rate was reduced in dams mated with males from the 10 and 50 mg/kg groups."

Pregnancy

1) The first sentence under subsection 'Teratogenic effects' should be modified to read: "Reproductive studies performed in mice, rabbits, and rats treated during the appropriate periods of gestation with doses up to 50mg/kg/day have revealed no evidence of harm to the fetus due to metolazone."

Recommendations

The sponsor should incorporate the above changes in the labeling prior to final approval. Comparable or identical statements should be recommended for the labeling of Microx (NDA 19-532).

The sponsor should be informed that the carcinogenicity studies conducted with metolazone were inadequate for the purpose of making an unequivocal assessment of the tumorigenic potential of the drug. Further, the sponsor should be informed that an additional study or studies will be necessary to modify this section of the labeling for metolazone.

<u>/S/</u>

CA/C 186

cc Orig. HFN/110 HFN/110/CSO HFN/110/RHarris/8/12/86 R/D init: CResnick/8/22/86

Table 20

NEOPLASMS OBSERVED IN RATS MEDICATED WITH METOLAZONE FOR TWO YEARS AND IN CONTROL RATS

Dose of Metolazone (mg/kg)	2. M		10. M	-	50. M	.0 F	Con	trol F
ENDOCRINE ORGANS Adrenal Gland Adenoma Pituitary Adenoma Pancreas - Acinar Adenoma Thyroid - Light Cell Adenoma	. •	1 .	1	4	1	5		1
MAMMARY GLAND Fibroadenoma Carcinosarcoma Reticulum Cell Sarcoma	-12	1 1* 1	·	1	-	3		1
UTERINE HORN Leiomyoma Polyp		1	٠		•			1
ACOUSTIC NEURINOMA				1				
ASTROCYTOMA			•		1			
TRANSITIONAL CELL CARCINOMA	•						1	
MALIGNANT LYMPHOMA	•	1*		•			,	
OVARIAN TUMOR						1		
TOTAL TUMORS		. 8	1	6	2.	9	1	4
SINGLE TYPE TUMOR - CASES		1	1	4	2	2	1	2
MULTIPLE NEOPLASIA - CASES	0	3	0	1	0	3	0	1
TOTAL ANIMALS	5	7	2	6	4	6	3	6

*Metastatic to Lungs

00031

Table 21

NEOPLASMS OBSERVED IN MICE MEDICATED WITH METOLAZONE FOR EIGHTEEN MONTHS AND IN CONTROL MICE

Dose of Metolazone	***							_	
(mg/kg)	2.0		10.0		50	50.0		Control	
Sex	M	F	М	F	M	F	М	F	
Lungs - Bronchogenic			2	1	النوني ،	2		1	
Liver - Hepatoma	2								
Hemangioma							1		
Reticulum Cell Sarcoma - Generalized	٠	2	1			2	1	2	
Total Neoplasms	2	2	3	1		4	2	3	
Number of Mice Examined	24	24	22	16	21	19	14	10	
Neoplasm Incidence Percent	8.:	3 8.3	3 13.6	6.3		21.1	14.3	30.0	

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Zaroxolyn® (metolazone) NDA 17-386/S-015 New Format Labeling Final Printed Copy (page 1 of 4)

Supplement: APR 30 1936

R-197A

PENNWALT ZAROXOLYN®

(metolazone)

Each ZAROXOLYN Tablet contains 2½, 5 or 10 mg of metolazone.

A-197A Per. 3/86

PENNWALT

ZAROXOLYN®

(metolazone)

Each ZAROXOLYN Tablet contain 21/2, 5 or 10 mg of metolazone

DESCRIPTION
ZAPIOXOLYN Tablets for oral administration
tem 2%, 5, or 10 mg of metolazone, a diu
saluretic/anti-hypertenence drug of the quinaz
cless ZAPIOXOLYN Tablets also contain mg

4-time-6-gumesolinesulfonemide, and a fer weight of 365.83. The structural formula

Reviewed by:

roxolyn® (metolazone) DA 17-386/S-015 w Format Labeling inal Printed Copy (page 2 of 4)

Supplement: APR 30 1935

BEDICATIONS AND USAGE
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Usage on Presence:

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CONTRABBICATIONS

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Supplement: APR 30 1900

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which is a condition that predaposes to digitalis tracity. Limite: Duristics may cause increased serum tevess of timum with the risk of temam toxicity, assum I makin requirements may be affected in debetics taking metodazone. Accord, Serbitarishs, aurostics, or anti-hyperteniere drugs. Patients taking metodazone may develop enthostatic hypotenision when any of times drugs are taken concomitarity. Recocurrence and arrapmosphirms. While not reported to date for metodazone, retained duristics have microased responsements to tubocurative and decreased arterial responsements to increprepartitive. Accordingly, it may be advisable to discourse. ZAROXOLYN three days before dective surgery.

to calconnect ZMOJACLTH trees mays before elective furgery. Sharod or ACTM Plerapy: Hypotalemis will be more common in association with cancomitant served or ACTM therapy. Annual studies concerning drug interactions with metolazone are discussed in the Pherma-

cology section.

OrugiCaleratory Interactions
There are no known instances of exteriorence by the drug with laboratory tests.

Fortity
Long-term animal studies with mistolazone have not shown any evidence of carcinogenicity. Mice and ress given the study for 1½ to 2 years at doses of 2; 10 and 50 mg/hg (13, 67 and 3.33 times respectively; the usual dary human dose of 0 15 mg/hg) showed no evidence that missolazone caused an increased number of furnors.

Reproductive partometric fine been eviduated in mice, riss and rabbes, in a rest study, in which makes were treased orably with missolazone at doses of 2; 10 and 50 mg/kg for 127 days prior to having with sattreased families; an impressed deserber of insecration state, mis charter and demonstrate of insecration state, mis charter and demonstrate of insecration state, mis charter and indented.

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ADVENSE REACTIONS
ZAROXOLYN is unusity usel interested, and most
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Cardiovascular system Cheel pervidecomfort.
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parabotations
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distress, derrina, constitution, antiresia, abdeminal blooting.

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minogen (BUN) or createrine, hypomosphistema

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Whenever advance reactions are moderate or severe, ZAROXOLYN dosage should be reduced or thereby until dean

and property

Zaroxolyn® (metol. NDA 17-386/S-015 New Format Labeling Final Printed Copy (page 4 of 4)

Supplement: APR 30 1996

rum electrolyte Changes and combitoe patient in enei function should be closely monitored sportine measures should be stigated as unred to mention hydration, sectrolyte energy compression and cardiovescular and renal electrolyte.

Britche.

DOSAGE AND ADMINISTRATION

Effective desage of ZAROXOLYN (mesolazone)
should be individualized according to indication
and potent response. A single daily dose is
recommended. Therapy end ZAROXOLYN should
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and is determine the invitate dose possible to
maintain therapoutic response.

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if doze offict. The time into the limit of edimental assess: The time into equival for the initial dozego to show officit orly. Durens and aburens usually begin in the front approach of 12 to 24 hours depen in dozego. When an initially-desired therape flect has been obtained, it may be adversed flect has been obtained, it may be adversed beduce the dozego. The deady dozego depends to severity of the patient's concision, and Make, and responsements A decounter in the Make, and responsements. Mahe, and responsiveness. A decision to change the daily dissage should be based on the results of borough clinical and laboratory evaluations. If artitripertensive drugs or durerics are given concurrently with ZAROKOVIN, more careful dissage adjustment may be necessary. For persons who tend to experience parenymial nocturnal dyspinas. It is usually advantable to employ a dissage near the upper end of the range, to ensure protongistion of dureries and ashirbess for a full 24-nour period.

Deponse in a tight, light-resistant container Caution. Federal law prohibits dispensing with a prescription

RJS"

E PENWALI cone ROCHESTER, M.Y. 14433

R-197A Per. 3/26

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