Center for Drug Evaluation and Research Viagra (Sildenafil)

"Joint Clinical Review" for NDA-20-895

Section 8, pages 40-56

8. Integrated review of safety

		o. Integrated review of safety
8.1.	Methodology	
8.1.1.	Deaths	For each death reported by the sponsor, the sponsor's narrative summary was compared with the case report form. The case report form was combed for indications of drug-relatedness of the immediate cause of death or associated problems.
8.1.2.	Serious adverse events	The sponsor identified serious adverse events as those that were fatal, life-threatening, permanently disabling, resulted in or prolonged hospitalization, associated with congenital anomaly, cancerous, or resulted from overdose of study drug.
8.1.3.	Withdrawals and o	ther significant adverse events
8.1.3.1.	Overall profile of withdrawals	Withdrawals were characterized by the primary associated event, as identified by the sponsor. The reviewers made no attempt to characterize other adverse events occurring in this sub-group, nor was any attempt made to recategorize the causes for withdrawal.
8.1.3.2.	Adverse events associated with with- drawal	Adverse events associated with withdrawal were analyzed separately for the double-blind and open-label periods. Case report forms were examined for all adverse events identified by the sponsor as leading to withdrawal, to look for drug-relatedness or associated problems. Tables were generated by the reviewers for adverse events leading to withdrawal, organized by content-dependent categories, and including dosing exposure and demographic data.
8.1.3.3.	Other significant adverse events	Common adverse events were analyzed separately for the double-blind and open-label periods. Dose-relatedness was assessed for common adverse events in placebo-controlled studies for which dosing information was available ¹ .
8.1.4.	Other search strate	gies
		Adverse events were reviewed on case report forms for deaths and withdrawals.
8.1.5.	Adverse event incid	lence
8.1.5.1.	Approach to elicit- ing adverse events in the development program	Protocols all contained provision for the periodic ascertainment of adverse events from subjects through non-directive questioning. There is no reason to suspect bias or inadequate reporting of adverse events with this methodology.
8.1.5.2.	Appropriateness of adverse event categorization and preferred terms	Rates for common adverse events were determined solely by the sponsor's categorization. There is, therefore, some possibility that some events were scattered among terms allocated, perhaps inappropriately, to multiple body systems. Little effort was spent searching the safety data systematically for such abuses. Categorization of events by body system and by likelihood of being related to study drug was performed by the reviewers.
8.1.5.3.	Identifying com- mon and drug-re- lated adverse events	Common adverse events in placebo-controlled studies were derived from the experience available electronically with the original submission.
8.1.5.4.	Additional analy- ses	No additional analyses of adverse events were performed.
8.1.6.	Laboratory finding	s .
8.1.6.1.	Extent of laboratory testing	Clinical chemistry, hematology, urinalysis, and ECG were all routinely performed at the beginning and end of blinded treatment periods in major studies. Testing was also performed at follow-up visits during open-label studies. This level of monitoring should be considered adequate for a drug for use in this population.
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controlled parallel-group studies.

8.1.6.2. Selection of studies

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and analyses for

drug-control com-

While serious event-related analyses covered all trial experience, analyses of trends in

laboratory data focussed on previously identified collections of double-blind. placebo-

^{1.} Unabridged datasets were supplied only for Studies 148-102, 148-103, 148-363, and 148-364.

8.1.6.3. Standard analyses

8.1.6.3.1. Analyses focussed on central tendency and outliers

The reviewers undertook a staged approach to examination of laboratory data. The sponsor identified no clinically significant changes in central tendency. The reviewers screened data for subjects experiencing a significant shift from a normal baseline value. In a few cases, all lab values were reviewed for the few subjects demonstrating at least an excursion to a clinically significant value. Specific details are described in the various sections dealing with laboratory findings.

8.1.6.3.2. Withdrawals for laboratory abnormalities

Withdrawals for laboratory abnormalities are listed among withdrawals for other adverse events.

8.1.7. Vital signs

Vital signs were analyzed in the same manner as clinical laboratory data.

8.1.8. ECGs

ECGs were analyzed in the same manner as other clinical laboratory data.

8.1.9. Special studies

The sponsor conducted studies of effects of sildenafil on vision, on platelet aggregation and bleeding, and on blood pressure response when co-administered with nitroglycerin.

Drug interaction studies are discussed elsewhere.

8.1.10. Withdrawal phenomena

Withdrawal effects have not been studied formally.

8.1.11. Abuse potential

Although there are no evident effects on the central nervous system indicative of a risk of physical dependence, it can be supposed that sildenafil will be prescribed in a population with little objective need. Sildenafil is also likely to be see use in a population outside of the one for which it is prescribed.

8.1.12. Human reproduction data

All studies were conducted in a population at low risk of pregnancy.

There are no reports of women conceiving with partners on sildenafil.

8.1.13. Overdose experience

The sponsor's recommendation is for dosing not to exceed once daily, but in studies, some subjects exceeded that by amounts difficult to ascertain. Single doses up to 800 mg have been studied formally in normal volunteers.

8.2. Safety results

8.2.1. **Deaths**

Deaths occurring on study drug or within 30 days of receipt of study drug are listed in Table 29 below. There was only one death on placebo. Of 8 deaths on sildenafil, all were of a cardiovascular nature and most occurred in a setting of risk factors and medical history making the observed events plausibly not related to study drug. In no case did an investigator attribute death to study drug.

Table 29. Deaths on or within 30 days of study drug.

Study	Subject	Age	Race	Dose mg	Description .
148-102	95220372	76	Cauc	Pcbo	History of diabetes and CHF. He died of self-inflicted gunshot wound on day 51.
148-104C	95110230	67	Cauc	100	History of diabetes, CHF, s/p aortic valve replacement. He died of multiple organ failure on day 51.
148-301	0090004	70	Cauc	40	Subject in angina study received 1 dose 11 days prior to emergency CABG. He died on day 14.
148-356	0780131	66	Cauc	10	History of smoking. He died on day 9 of presumed myocardial infarction. There was no autopsy.
148-363	1090178	66	Cauc	25	History of alcohol abuse, hypertension, hypercholesterolemia. He died of probable myocardial infarction on day 89.

Table 29. Deaths on or within 30 days of study drug. (Continued)

Study	Subject	Age	Race	Dose ing:	Description
148-365	0950016	53	Cauc	100	No pertinent history. Died of myocardial infarction on day 17.
148-370	1390461	64	Cauc	Unk	History of arrhythmia (unspecified). He fell and suffered a cerebral hemorrhage and died of pulmonary sepsis on day 155.
148-365	0270007	62	Cauc	50	History of coronary artery disease. He died of myocardial infarction on day 104.
148-370	1540729	58	Cauc	50	He died of cardiac failure secondary to metastatic bladder carcinoma an unknown time after receiving study drug.
148-102C	95220009	57	Cauc	100	History of hypertension. He completed 6 months open-label and died of myocardial infarction 1 or 13 days after the last dose.

8.2.2. Withdrawals

8.2.2.1. Withdrawals for any cause

* 8.2.2.1.1. Withdrawals from placebocontrolled studies Reasons for withdrawal from placebo-controlled studies are shown in Table 30 below. Lack of effectiveness (LOE) was the most common cause for withdrawal from placebo groups, particularly in longer-running studies. Adverse events (AE) and withdrawal of consent (With) were less than half as common in the placebo group. Lack of effectiveness was a much less common cause for withdrawal from sildenafil treatment groups (about 27% as common). Adverse events as reasons for withdrawal had the same incidence in placebo and sildenafil treatment groups. Laboratory abnormalities, loss to follow-up, 'other' (Oth), protocol violations, and withdrawal of consent were all more common on placebo than on sildenafil. There were 3 deaths on sildenafil versus none on placebo, and 3 subjects withdrawn from sildenafil because they were randomized in error versus none on placebo. Overall, 16% of subjects randomized to placebo and 9% of subjects randomized to sildenafil withdrew for any reason from placebo-controlled studies, with much of the difference between groups being attributable to differences in rates of withdrawal for lack of effectiveness, particularly in longer-running studies.

Table 30. Withdrawals from placebo-controlled studiesa.

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					Pl	aceb	o:				4				, N	Sil	dena	fil				
	N:	AE	Death	TOE	Lab	LFU	OIII	Viol	With	Rand	Any	N	AE	Death	TOE	Lab	DEG	Oth	Viol	With	Rand	Amy
148-101/101B	83	6	_	1	1	_	2	_	6	<u> </u>	16	333	5	1	6	3	3	8	4	11		41
148-102	216	5	_	11	1	6	3	4	6	_	36	316	8	_	5	2	6	3	4	3		31
148-103	166	4		3	_	2	2	1	1	_	13	163	3	_	1	_	3		_	2	_	9
148-104	132	1	_	1	3	_	1	_	5	_	11	136	1	_	1		1	=	_	2		5
148-106	122	4	_	8	2	2	1	1	_	_	18	375	16		7	2	5	5	3	4	1	43
148-353	95	4		_	_	4	_	_	_	1	9	256	13		4	3	2	3		<u> </u>		25
148-355	43	1	_		_	1		1	_		3	44				_	1		1		_	2
148-359	54	2	_	1		2	4	1	1		11	57			1	_		_	_	_		1
148-361	59	1		_	_	_		2	2		5	195	2	_	1	1	_	_	2	3	1	10
148-363	156	5		54	3	5	4	2	4	_	77	159	8	2	13	2	4	2	3	_	1	35
148-364	127	1		6	_	2	_	_	2	_	11	387	6		3	1	3	1	2	3	_	19
148-367	89	2		_	1		1				4	89	5		Ť	_	1	Ė	_	-		6
Total	1342	36	0	85	11	24	18	12	27	1	214		67	3.	42	14	29	22.	19	28	3*	227
Incidence (%)	j	2.7	1	6.3	0.8	1.8	1.3	0.9	2.0	_	16		2.7	0.1	1.7	0.6	1.2	0.9	0.8	1.1	0.1	9.0

a. AE = adverse event; LOE = lack of effectiveness; Lab = laboratory abnormality; LFU = loss to follow-up; Viol = protocol violation; With = withdrawal of consent; Rand = randomization in error.

8.2.2.1.2. Withdrawals from open-label extensions

Reasons for withdrawal from open-label studies are shown in Table 31 below. The incidence of withdrawals for lack of effectiveness was higher during open-label studies than during placebo-controlled studies, but the incidence is very low and the period of exposure is much longer for open-label studies. Overall, only 10% of subjects withdrew for any reason from open-label studies.

Sildenafil: Sildenafil 148-101C 148-354B 148-102C 148-354C 148-103C 148-3610 148-104C 148-366 148-105 148-350 Total

Table 31. Withdrawals from open-label studies.

8.2.2.2. Withdrawals for adverse events

2 | 5

5 | 3

8.2.2.2.1. Withdrawals from placebocontrolled studies

148-354A

Subjects who discontinued from double-blind, placebo-controlled studies because of adverse event or adverse laboratory values are shown in Table 32 below. Dosing and evaluation of events as serious or not was available from all studies; where the dose of a subject randomized to sildenafil was not available from the sponsor's integrated safety database, the value is shown below as '>0' and where the evaluation of seriousness was unavailable, the table shows '?'. Event categories were established by clinical importance or apparent frequency in the data; some subjects have events match more than one category and are listed multiple times. Lines are not replicated in the 'other' category. For some categories, the available CRFs were scanned for pertinent baseline findings or medical history.

1.9

4.4

0.6 1.3 0.9

0.3

Incidence (%)

Table 32. Adverse events leading to withdrawal from placebo-controlled studies.

Study	PID 🖝	Dose	Age	Race	Days	SAE	Related	Description							
Cardi	ovascular—	arrhyt	hmia												
101	95000036	0	68	White	151	?	N	Deep thrombophlebitis, atrial fibrillation							
101	95030028	0	62	White	50	?	Y	Palpitation; history of MI							
102	95270566	0	64	Black	43	Y	N	Atrial fibrillation; no relevant history							
353	630409	0	43	White	1	?	Y	Palpitation, anxiety; no relevant history							
363	The state of the s														
106 95670251 >0 70 White 57 ? N Atrial fibrillation; history of MI, hypertension, arrhythmia															
363	1160280	>0	70	White	81	?	N	Cardiomyopathy; arrhythmia; agitation, arthralgia							
363	1090178	25	65	White	92	Y	N	Cardiac arrest; history of hypertension							
Cardio	ovascular—	blood	press	ure											
101	95020385	0	64	White	30	?	N	Hypertension							
106	95720414	>0	63	Other	41	?	N	Hypotension; asthenia; vomiting; diarrhea							
353	550371	>0	49	White	27	?	N	Vasodilation							
363	1260328	>0	62	White	58	?	Y	Vasodilation; abdominal pain							
363	1320081	100	59	White	126	N	N	Hypertension; history of same							
Cardio	ovascular—	myoca	rdial	infarcti	on										

Table 32. Adverse events leading to withdrawal from placebo-controlled studies. (Continued)

Study	PID	Dose	Age	Race	Days		Related	Description					
103	95000163	0	63	White	29	Y	N	Myocardial infarction, stroke; history of CABG, peripheral vascular disease, hypertension					
103	95070035	0	64	White	56	Y	N	Myocardial infarction, angioplasty; no relevant history					
106	95610018	0	55	White	68	?	N	Myocardial infarct; history of hypertension, CAD, angina, diabetes, hyperlipidemia					
106	95780138	0	59	White	59	?	N	Respiratory tract infection, MI; history of hypertension and smoking					
355	850113	0	62	White	29	?	Y	Respiratory tract infection, MI; no relevant history					
361	1020009	>0	68	White	45	?	N	Myocardial infarct; history of diabetes					
102	95050319	25	64	White	86	Y	N	Myocardial infarction; no relevant history					
102	95170401	50	63	White	192	Y	N	Myocardial infarction; no relevant history					
Cardio	ovascular—	other		-									
102	95220372	0	76	White	15	N	N	Shortness of breath, heart failure; history of myocardial infarction, CABG, and diabetes					
106	95740242	0	62	White	32	?	N	Anxiety, CAD, dyspnea					
101	95210164	>0	49	White	113	?	N	Hemoptysis; cardiomyopathy; infection					
106	95670251	>0	70	White	57	?	N	Worsening heart failure; pharygitis; history of hypertension, MI, arrhythmia. CHF					
363	1190322	>0	64	White	92	?	N	Cerebrovascular disorder; history of diabetes and TIA					
364	1440268	>0	76	White	73	?	N	Cerebrovascular disorder, AV block; history of hypertension					
363	1120007	50	74	White	48	N	Y	ECG changes; no relevant history					
102	95390139	100	63	White	1	Y	N	Coronary artery disease; history of hypertension, myocardial infarction					
103	95450321	100	57	White	57	Y	N	Angina; history of peripheral vascular disease, hypertension					
363	1160280	100	70	White	81	Y	N	Cardiomyopathy, arrhythmia; history of peripheral vascular disease					
LFT													
101	95080249	0	47	Black	36	?	Y	SGOT, SGPT increased; no relevant history					
101	95100088	0	68	White	114	?	N	Hepatoma, back pain					
102	95350454	0	43	White	21	N	Y	Increased LFTs; no relevant history					
106	95810153	0	65	White	31	?	Y	SGOT, SGPT increased; no relevant history					
363	1250374	0	60	White	73	?	Y	SGPT, SGOT, AlkP increased; no relevant history					
363	1250374	0	60	White	73	N	Y	Liver enzyme elevation; no relevant history					
363	1270108	0	58	White	143	N	N	Liver enzyme elevation; no relevant history					
367	1630409	0	36	White	25	?	Y	Skin disorder; SGOT, SGPT increased; no relevant history					
101	95190375	>0	55	White	13	?	Y	Liver function tests abnormal; headache					
353	640358	>0	63	White	3	?	N	BUN, AlkP, SGPT, SGOT increased; no relevant history					
102	95290191	25	50	White	98	N	N	Increased LFTs; history of peripheral vascular disease					
102	95370156	50	55	Black	95	N	Y	Increased LFTs; no relevant history					
364	1460269	100	53	White	70	N	N	Liver enzyme elevation, attributed to alcohol; history of manic-depression, but not alcohol abuse					
Heada													
102	95220247	0	70	White	18	N	Y	Nausea, headache					
103	95000202	0	66	White	30	N	Y	Headache, dizziness; no relevant history					
353	100180	0	59	White	28	?	Y	Headache					
363	1060054	0	58	White	28	N	Y	Headache; no relevant history					
367	1650393	0	44	White	25	?	Y						
101	95190375	>0	55	White	13	?	Y	Liver function tests abnormal; headache					
101	95200154	>0	73	White	4	?	Y	Emotional lability; headache; nervousness					
106	95410089	>0	58	White	13	?	Y	Diarrhea; headache; abnormal vision					

Table 32. Adverse events leading to withdrawal from placebo-controlled studies. (Continued)

Study	PID	Dose	Age	Race	. 5 00,71,6300,600,6	-	Related	split and seasons are seasons and seasons and seasons and seasons are seasons				
106	95670264	>0	62	White	200000000000000000000000000000000000000	?	Y	Headache; asthenia; abdominal pain				
106	95680385		79	White	6	?	Y	Bloody diarrhea; headache				
106	95680417	>0	66	White	15	?	Y	Headache				
106	95690312	>0	68	White	5	?	Y	Abnormal vision; vomiting; lacrimal disorder; headache				
106	95740247	>0	62	White	28	?	Y	Headache; asthenia; dyspepsia; vasodilation				
106	95740297	>0	46	White	28	?	Y	Anorexia; headache; abnormal vision; rhinitis; eructation				
106	95800083	>0	65	White	29	?	N	Headache; hyperglycemia				
106	95800142	>0	54	White	8	?	N	Gum hemorrhage; vasodilation; headache; nausea				
353	260186	>0	56	White	29	?	N	Flu syndrome; headache				
353	270034	>0	24	White	28	?	Y	Headache; hypertonia; dyspepsia; pain				
353	310101	>0	54	White	15	?	Y	Headache; vasodilation				
353	310104	>0	49	Asian	10	?	Y	Respiratory disorder; headache				
353	360021	>0	54	White	14	?	<u> </u>	Eye pain; myalgia; headache				
353	640354	>0	44	White	29	?	<u> </u>	Vasodilation; headache; pharyngitis; rhinitis; epistaxis				
353	670390	>0	54	White	14	?	<u> </u>	Nausea; headache; somnolence; respiratory disorder				
363	1080247	>0	70	White	13	?	<u> </u>	Headache; abnormal vision				
363	1110213	>0	55	White	48	?	Y	Insomnia; headache				
363	1220302	>0	52	White	8	7	<u> </u>	Dizziness; headache				
364	1460269	>0	53	White	70	?	N	Liver function tests abnormal; headache				
367	240105	>0	32	White	18	?	N	Headache				
367	1650391	>0	40	White	7	?	<u> </u>	Nausea; headache				
367	1800058	>0	48	White	9	?		Nausea; dyspepsia; vasodilation; headache				
364	160490	>0	70	White	5	?	Y	Headache				
364	750613	>0	65	Black	2	?	N	Dyspepsia; diarrhea; flatulence; headache; vomiting; nausea; abdominal				
363	1080247	25	70	White	13	N		pain Headache, visual disturbance; no relevant history				
363	1220302	25	52	White	8	N	<u> </u>	Headache, dizziness; no relevant history				
363	1110213	50	55	White	48	N	_ <u></u>	Headache; no relevant history				
363	1190322	50	64	White	92	Y		CVA, headache; no relevant history				
102	95190117	100	41	White	94	N	Y	Headache, heartburn; no relevant history				
102	95370159	100	72	White	4	N	<u> </u>	Headache				
103	95070087	100	72	White	50	N	<u> </u>	Headache, flushing; history of hypertension				
364	160490	100	70	White	5	N	Y	Headache, new onset diabetes; no relevant history				
Visual	disturbance			********	1			- Sept. Calcolog, no reterant instory				
102	95330219	0	73	White	34	N	N	Retinal changes; history and in-study atrial fibrillation				
106	95690312	>0	68	White	5	?	Y	Abnormal vision; vomiting; lacrimal disorder; headache				
106	95740297	>0		White	28	?	Y	Anorexia; headache; abnormal vision; rhinitis; eructation				
363	1080247	>0	70	White	13	?	Y	Headache; abnormal vision				
	95800084	>0	59	White	15	?		Retinal hemorrhage				
	95800088	>0	53	White	8	?	Y	Abnormal vision				
353	310102	>0	29	White	8	?		Abnormal vision				
363	1080247	25	70	White	13	N	Y	Headache, visual disturbance; no relevant history				
Other	15 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1											
—	95000038	0	60	White	120	?	N	Chest pain				
			-55		1		11					

Table 32. Adverse events leading to withdrawal from placebo-controlled studies. (Continued)

Study	
102 95250463 0 66 White 57 Y N Mesothelioma, stroke; history of hypertension, diabetes 103 95400300 0 67 White 71 Y N Possible TIA; no relevant history 104 95360115 0 40 White 1 ? N Npn increased 104 95480148 0 70 White 17 ? N Hyperglycemia 106 95770197 0 54 White 66 ? N Varicose vein, bilirubinemia 353 100177 0 54 White 14 ? Y Diarrhea 353 330089 0 35 White 14 ? Y Psoriasis 330089 0 35 White 19 ? Y Psoriasis 359 270032 0 54 White 28 ? N Procedure 1030253 0 62 White 68 ? N Procedure (medical/surgical/health service) 361 1030253 0 62 White 68 ? N Procedure (medical/surgical/health service) 363 1130297 0 57 White 30 ? N Arthralgia, anemia, bronchitis, gastritis 363 1080245 0 59 White 73 Y N << <ae missing.="" page="">> 363 1150254 0 60 White 17 Y N Prostate cancer 363 1180309 0 33 White 1 N N "Aggravation of" alcohol abuse; no relevant history 363 1130297 0 57 White 30 N N Anemia; present from baseline 364 1520233 0 58 White 23 Y N Major depression; history of depression 101 95000039 >0 65 White 87 ? N Respiratory disorder, arthralgia, esoghageal ulcer 101 95170355 >0 66 White 87 ? N Respiratory disorder, arthralgia, esoghageal ulcer 101 95200155 >0 72 White 76 ? N Allergic reaction 101 95200157 >0 52 White 11 ? Y Asthenia; myalgia; tachycardia; pain 106 95670241 >0 78 White 11 ? Y Asthenia; myalgia; tachycardia; pain 106 95670241 >0 78 White 11 ? Y Asthenia; myalgia; tachycardia; pain 106 107 </ae>	
103	
104 95360115 0 40 White 1 ? N Npn increased	
104 95480148 0 70 White 17 ? N Hyperglycemia	
106 95770197 0 54 White 66 ? N Varicose vein, bilirubinemia 353 100177 0 54 White 14 ? Y Diarrhea 353 330089 0 35 White 19 ? Y Psoriasis 359 270032 0 54 White 28 ? N Procedure 359 600070 0 63 White 62 ? N Pancreatitis, abdominal pain 361 1030253 0 62 White 68 ? N Procedure (medical/surgical/health service) 363 1130297 0 57 White 30 ? N Arthralgia, anemia, bronchitis, gastritis 363 1080245 0 59 White 73 Y N < <ae missing.="" page="">> 363 1150254 0 60 White 17 Y N Prostate cancer 363 1180309 0 33 White 1 N N "Aggravation of" alcohol abuse; no relevant history 363 1130297 0 57 White 30 N N Anemia; present from baseline 364 1520233 0 58 White 23 Y N Major depression; history of depression 101 95000039 >0 65 White 96 ? N Carcinoma 101 95170123 >0 46 White 87 ? N Respiratory disorder, arthralgia, esoghageal ulcer 101 95170355 >0 66 White 94 ? N Thrombocytopenia 101 95200155 >0 72 White 76 ? N Allergic reaction 101 95200157 >0 52 White 112 ? N Respiratory tract infection; lymphoma-like reaction; abscess; lymphadenopathy 106 95670241 >0 78 White 11 ? Y Asthenia; myalgia; tachycardia; pain</ae>	
353 100177 0 54 White 14 ? Y Diarrhea	
353 330089 0 35 White 19 ? Y Psoriasis	
359 270032 0 54 White 28 ? N Procedure	
359 600070 0 63 White 62 ? N Pahcreatitis, abdominal pain 361 1030253 0 62 White 68 ? N Procedure (medical/surgical/health service) 363 1130297 0 57 White 30 ? N Arthralgia, anemia, bronchitis, gastritis 363 1080245 0 59 White 73 Y N << <ae missing.="" page="">> 363 1150254 0 60 White 17 Y N Prostate cancer 363 1180309 0 33 White 1 N N "Aggravation of" alcohol abuse; no relevant history 363 1130297 0 57 White 30 N N Anemia; present from baseline 364 1520233 0 58 White 23 Y N Major depression; history of depression 101 95000039 >0 65 White 96 ? N Carcinoma 101 95170123 >0 66 White 87 ? N Respiratory disorder, arthralgia, esoghageal ulcer 101 95170355 >0 66 White 94 ? N Thrombocytopenia 101 95200155 >0 72 White 76 ? N Allergic reaction 101 95200157 >0 52 White 112 ? N Respiratory tract infection; lymphoma-like reaction; abscess; lymphadenopathy 106 95670241 >0 78 White 11 ? Y Asthenia; myalgia; tachycardia; pain </ae>	
361 1030253 0 62 White 68 ? N Procedure (medical/surgical/health service) 363 1130297 0 57 White 30 ? N Arthralgia, anemia, bronchitis, gastritis 363 1080245 0 59 White 73 Y N C< <ae missing.="" page="">> 363 1150254 0 60 White 17 Y N Prostate cancer 363 1180309 0 33 White 1 N N "Aggravation of" alcohol abuse; no relevant history 363 1130297 0 57 White 30 N N Anemia; present from baseline 364 1520233 0 58 White 23 Y N Major depression; history of depression 101 95000039 >0 65 White 96 ? N Carcinoma 101 95170123 >0 46 White 87 ? N Respiratory disorder, arthralgia, esoghageal ulcer 101 95170355 >0 66 White 94 ? N Thrombocytopenia 101 95200155 >0 72 White 76 ? N Allergic reaction 101 95200157 >0 52 White 112 ? N Respiratory tract infection; lymphoma-like reaction; abscess; lymphadenopathy 106 95670241 >0 78 White 11 ? Y Asthenia; myalgia; tachycardia; pain </ae>	
363 1130297 0 57 White 30 ? N Arthralgia, anemia, bronchitis, gastritis 363 1080245 0 59 White 73 Y N <<<< AE page missing.>> 363 1150254 0 60 White 17 Y N Prostate cancer 363 1180309 0 33 White 1 N N Anemia; present from baseline 364 1520233 0 58 White 23 Y N Major depression; history of depression 101 95000039 >0 65 White 96 ? N Carcinoma 101 95030030 >0 60 Black 65 ? N Leukopenia 101 95170123 >0 46 White 87 ? N Respiratory disorder, arthralgia, esoghageal ulcer 101 95200155 >0 72 White 7 N Allergic reaction <td></td>	
363 1080245 0 59 White 73 Y N << <ae missing.="" page="">> 363 1150254 0 60 White 17 Y N Prostate cancer 363 1180309 0 33 White 1 N N "Aggravation of" alcohol abuse; no relevant history 363 1130297 0 57 White 30 N N Anemia; present from baseline 364 1520233 0 58 White 23 Y N Major depression; history of depression 101 95000039 >0 65 White 96 ? N Carcinoma 101 95030030 >0 60 Black 65 ? N Respiratory disorder, arthralgia, esoghageal ulcer 101 95170123 >0 46 White 94 ? N Thrombocytopenia 101 95200155 >0 72 White 76 ? N</ae>	
363 1150254 0 60 White 17 Y N Prostate cancer 363 1180309 0 33 White 1 N N "Aggravation of" alcohol abuse; no relevant history 363 1130297 0 57 White 30 N N Anemia; present from baseline 364 1520233 0 58 White 23 Y N Major depression; history of depression 101 95000039 >0 65 White 96 ? N Carcinoma 101 95030030 >0 60 Black 65 ? N Leukopenia 101 95170123 >0 46 White 87 ? N Respiratory disorder, arthralgia, esoghageal ulcer 101 95170355 >0 66 White 94 ? N Allergic reaction 101 95200155 >0 72 White 76 ? N Resp	
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363 1130297 0 57 White 30 N N Anemia; present from baseline 364 1520233 0 58 White 23 Y N Major depression; history of depression 101 95000039 >0 65 White 96 ? N Carcinoma 101 95030030 >0 60 Black 65 ? N Leukopenia 101 95170123 >0 46 White 87 ? N Respiratory disorder, arthralgia, esoghageal ulcer 101 95170355 >0 66 White 94 ? N Thrombocytopenia 101 95200155 >0 72 White 76 ? N Allergic reaction 101 95200157 >0 52 White 112 ? N Respiratory tract infection; lymphoma-like reaction; abscess; lymphadenopathy 106 95670241 >0 78 White 11 ?	
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101 95170123 >0 46 White 87 ? N Respiratory disorder, arthralgia, esoghageal ulcer 101 95170355 >0 66 White 94 ? N Thrombocytopenia 101 95200155 >0 72 White 76 ? N Allergic reaction 101 95200157 >0 52 White 112 ? N Respiratory tract infection; lymphoma-like reaction; abscess; lymphadenopathy 106 95670241 >0 78 White 11 ? Y Asthenia; myalgia; tachycardia; pain	
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106 95670241 >0 78 White 11 ? Y Asthenia; myalgia; tachycardia; pain	
1100 93610144 >0 39 White 13 ? N Artenoscierosis	
353 290055 >0 63 White 29 ? Y Dyspepsia	
353 340113 >0 49 White 14 ? N Asthenia; back pain; weight loss; nausea	
353 360026 >0 61 White 15 ? Y Pain	
353 520211 >0 63 White 14 ? Y Abdominal pain; leg cramps	
353 560279 > 0 69 White 22 ? Y Kidney function abnormal; insomnia; anxiety	
361 1020009 >0 68 White 45 ? N Joint disorder	
361 1030286 >0 61 White 59 ? N Dyspepsia	
363 1090177 >0 68 White 195 ? N Accidental fall	
363 1210354 >0 65 White 4 ? N Hyperglycemia	
363 1220382 >0 57 White 4 ? Y Nausea; diarrhea	
364 630018 >0 54 White 3 ? Y Abdominal pain	
364 630018 >0 54 White 3 ? Y Vomiting; dyspepsia	
364 1440254 >0 79 White 58 ? N Chest pain	
367 240105 >0 32 White 18 ? N Skin ulcer	
367 240104 >0 45 White 4 ? Y Conjunctivitis; headache	1
367 1590133 >0 38 White 20 ? N Abdominal pain; hypesthesia	

Table 32. Adverse events leading to withdrawal from placebo-controlled studies. (Continued)

Study	PID	Dose	Age	Race	Days	SAE	Related	totis (all Description).
102	95110054	25	48	White	174	Y	N	Need for concomitant medication; history of hypertension, myocardial infarction, and angioplasty
102	95270399	25	67	White	1	N	Y	Nausea, vomiting
363	1220382	25	57	White	4	N	Y	Nausea, diarrhea
363	1210354	25	65	White	4	N	N	Hyperglycemia; history of diabetes
102	95170103	50	64	White	13	N	Y	Back and leg ache; no relevant history
103	95400284	50	58	White	10	Y	N	Cerebral infarct; no relevant history
363	1090177	50	68	White	195	Y	N	Accidental death
364	1440268	50	76	White	73	Y	N	TIA; history of hypertension
363	1260328	100	62	White	58	N	Y	Hot flushes, stomach ache
364	630018	100	54	White	3	N	Y	Abdominal pain, vomiting
364	750613	100	65	Black	2	N	N	Subacute intestinal obstruction; no relevant history
364	1380438	100	64	White	58	Y	N	Hepatic metastasis of bladder cancer
364	1440254	100	79	White	58	N	N	Chest (muscle) pain; history of asymptomatic supraventricular arrhythmia

8.2.2.2.2. Withdrawals from open-label extensions

Adverse events or laboratory findings associated with or contributing to withdrawal from open-label studies are shown in Table 33 below. This table is similar to Table 32 on page 43, but for none of these trials was the dosing information or an evaluation of seriousness easily determined from the electronic data, so these fields are omitted.

Table 33. Adverse events leading to withdrawal from open-label studies

Study	PID	Age	Race	Days	SAE	Description						
Cardio	vascular											
101C	95080079	60	White	148	Yes	Abnormal vision; dyspnea; vasodilation						
101C	95070326	60	White	158	Yes	Rhinitis; dyspepsia; vasodilation						
101C	95110232	58	White	83	No	Conjunctivitis; angina pectoris; insomnia; rectal hemorrhage; vasodilation						
105	95060053	24	Black	1	Yes	Vertigo; vasodilation						
104C	95470185	57	White	12	Yes	Dizziness; hypertension; headache						
101C	95230285	60	White	185	No	Procedure (medical/surgical/health service); CAD						
354B	00956162	68	White	355	No	Myocardial infarct						
LFT												
101C	95210169	68	White	149	No	SGOT, AlkP increased						
103C	95000157	49	White	30	No	Alkaline phosphatase increased						
354A	00290057	61	White	336	No	Arthritis; convulsion; AlkP increased						
354C	00248018	63	White	61	Yes	Liver function tests abnormal						
354C	00608071	48	White	179	No	Liver function tests abnormal; flu syndrome						
366	1150260	47	White	24	Yes	Liver function tests abnormal						
Headac	che											
101C	95050318	73	Asian	79	Yes	Headache, dizziness, prostatic disorder, abnormal vision						
101C	95110237	61	White	89	Yes	Headache; rhinitis						
102C	95000286	75	White	15	No	Sweating; dizziness; lab test abnormal; headache						
103C	95070065	64	White	28	Yes	Headache						
103C	95110155	64	White	57	Yes	Herpes simplex; headache						
103C	95430169	68	White	28	Yes	Headache; abdominal pain						
104C	95470185	57	White	12	Yes	Dizziness; hypertension; headache						

Table 33. Adverse events leading to withdrawal from open-label studies

Study	PID	Age	Race	Days	SAE	Description					
354A	00240020	42	White	6	Yes	Dyspepsia; headache; lacrimation disorder; voice alteration; respiratory disorder					
354A	00580141	53	White	49	Yes	Headache; dyspepsia; respiratory tract infection					
354C	00608067	55	White	110	Yes	Headache					
Visual	disturbance										
101C	95050318	73	Asian	79	Yes	Headache, dizziness, prostatic disorder, abnormal vision					
101C	95080079	60	White	148	Yes	Abnormal vision; dyspnea; vasodilation					
103C	95180011	56	White	54	Yes	Abnormal vision; vasodilation; headache.					
104C	95070012	75	White	10	Yes	Pain; abnormal vision					
354A	00670400	36	White	50	Yes	Diarrhea; abnormal vision; abdominal pain					
Other											
101C	95020018	67	White	82	No	Carcinoma					
101C	95090208	60	White	124	No	Lymphadenopathy; lymphoma-like reaction					
101C	95100418	77	White	121	No	Procedure (medical/surgical/health service)					
101C	95130101	72	White	175	No	Carcinoma; accidental injury					
101C	95140113	64	Other	169	No	Respiratory tract infection					
101C	95140113	64	Other	169	No	Hyperglycemia; insomnia; constipation; pancreatitis; gastrointestinal carcinoma; dyspepsia; anorexia; hernia; cholelithiasis					
101C	95150198	65	White	192	No	Dyspnea; lung edema					
101C	95220177	72	White	148	Yes	Dizziness; pain					
101C	95220276	73	White	10	No	Deafness; encephalopathy; dizziness					
350	100008	42	White	2	Yes	Dyspepsia					
354A	00240020	42	White	6	Yes	Dyspepsia; headache; lacrimation disorder; voice alteration; respiratory disorder					
354A	00242119	63	White	73	Yes	Flu syndrome; hemorrhage					
354A	00290056	57	White	66	No	Dizziness					
354A	00480226	45	White	261	No	Seborrhea					
354A	00620334	66	White	130	No	Skin melanoma					
354A	00620415	45	Other	110	No	Leukopenia; gastritis; dyspepsia					
354A	00640360	61	White	113	No	Cerebral thrombosis					
354A	00690250	65	White	24	Yes	Abdominal pain					
354B	00776040	57	White	352	Yes	Flu syndrome; somnolence; angina pectoris; headache; respiratory tract infection					
354B	00776246	51	White	56	Yes	Rhinitis; pain					
354B	00786106	47	White	239	No	Abdoininal pain					
354B	00786106	47	White	239	No	O Testis disorder; carcinoma; back pain					
354B	B0087620	69	White	266	No	(O Carcinoma					
3610	01030249	49	White	84	Yes	Sinusitis; vasodilation					

8.2.3. Common adverse events

8.2.3.1. Relationship to dose

Dose-relatedness of common adverse events was investigated for the 4 placebo-controlled studies for which dosing information was available—Studies 102, 103, 363, and 364. The denominators for incidence were the numbers of subjects exposed to a dose; because three of these studies were titration studies, many subjects contributed to the denominators for more than one active dose level.

Dose-relatedness of adverse events is shown in Table 34 below. Headache, dyspepsia, rhinitis, vision abnormalities, arthralgia, pain, abdominal pain, and rash were plausibly dose-related.

Table 34. Dose-relatedness of common adverse events in placebo-controlled studies.

and the	Pla	cebo			Sild	enaf	1			Dia		Sildenafil					
	N=	-665	25 mg		50 mg 100 m N=519 N=43			mg 439		Placebo N≡665		25 mg		50 mg N≟519		100 m N≐43	
1	n %		n,	%.	п. %		n	%		n.	%	n	%	n	%	n.	%
Headache	58	8.7	81	21	122	24	126	29	Dizziness	13	2.0	15	3.8	16	3.1-	14	3.2
Vasodilation	9	1.4	69	18	103	20	89	20	Arthralgia	17	2.6	6	1.5	9	1.7	14	3.2
Dyspepsia	16	2.4	15	3.8	42	8.1	51	12	Pain	10	1.5	6	1.5	9	1.7	19	4.3
Respir tract infect	48	7.2	14	3.6	18	3.5	18	4.1	Sinusitis	23	3.5	4	1.0	6	1.2	11	2.5
Back pain	18	2.7	16	4.1	21	4.0	11	2.5	Abdominal pain	11	1.7	4	1.0	6	1.2	14	3.2
Accident	27	4.1	10	2.5	17	3.3	12	2.7	Diarrhea	14	2.1	9	2.3	6	1.2	9	2.1
Rhinitis	17	2.6	7	1.8	16	3.1	23	5.2	Rash	13	2.0	4	1.0	7	1.3	12	2.7
Flu syndrome	23	3.5	17	4.3	1	2.1	11	2.5	Nausea	4	0.6	8	2.0	9	1.7	12	2.7
Abnormal vision	5	0.8	5	1.3	12	2.3	38	8.7						-			

8.2.3.2. Overall incidence

The sponsor and the reviewers agree that the description of the incidence of adverse events most likely to mirror any subsequent experience in clinical practice would be derived from placebo-controlled flexible-dosing studies². Table 35 below lists events by body system with an incidence of at least 1% in the combined sildenafil treatment group.

Table 35. Percentage of subjects with common adverse events in flexible-dosing studies.

A STATE OF S	Placebo N=725	Sildenafil N=734	214	Management of the Control of the Con	Sildenafil IN=734
Any	41	60	Musculoskeletal	4.5	5.4
General	15	26	Arthralgia	1.5	2.0
Headache	3.9	16	Myalgia	1.0	1.2
Flu syndrome	2.9	3.3	Nervous system	5.2	9.3
Back pain	1.7	2.2	Dizziness	1.2	2.2
Abdominal pain	1.0	1.5	Nervousness		1.8
Asthenia	0.6	1.4	Hypertonia	0.6	1.6
Infection	0.2	1.2 Respiratory		11	13
Pain	1.0	1.1	Rhinitis	1.5	4.2
Accident	1.7	1.1	Respir tract infec	5.4	4.2
Cardiovascular	4.1	14	Respiratory disorder	0.8	1.9
Vasodilation	0.7	11	Pharyngitis	1.4	1.4
Gastrointestinal	6.6	14	Skin	4.1	5.4
Dyspepsia	1.7	6.5	Rash	1.4	2.2
Diarrhea	1.0	2.6	Special sense	1.4	6.0
Nausea	0.4	1.2	Abnormal vision	0.4	2.7
Tooth disorder	0.8	1.1	Urogenital		
Hematologic	0.8	0.8	Urinary tract infec	5.1 1.5	7.1 3.1
Metabolic/nutritional	1.9	2.2	Prostate disorder	1.0	1.2

^{2.} Studies 148-103, 148-104, 148-355, 148-359, 148-363, and 148-367.

8.2.4. Laboratory data

8.2.4.1. Hepatic function

Laboratory abnormalities pertaining to hepatic function were screened by identification of subjects in placebo-controlled studies who had bilirubin, SGOT, SGPT, or alkaline phosphatase within normal limits at baseline but increased 2-fold from baseline at study end. For such subjects, bilirubin, SGOT, SGPT, alkaline phosphatase, albumin, and total protein values were abstracted for further examination. Subjects were then classified as having abnormalities limited to bilirubin only, or abnormalities (greater than 2-fold increase from baseline) in enzymes as well.

The incidence of hepatic function abnormalities is shown in Table 36 below. Most of the recorded abnormalities were isolated increases in bilirubin, SGOT, or SGPT. Only 2 subjects³, both on sildenafil, had as much as a doubling of alkaline phosphatase. In placebo-controlled studies, the rates and severity of laboratory abnormalities pertaining to hepatic function were similar in placebo and active treatment groups.

		Placebo N=1342		Sildenafil N=2510					
	п	%	-fold max	n	- %	-fold max			
Bilirubin only	22	1.6	2.1	35	1.4	4.0			
Enzymes 1 2	23	1.7 0.4	19	46 9	1.8 0.4	17			

Table 36. Hepatic function abnormalities in placebo-controlled studies.

8.2.4.2. Renal function

Laboratory abnormalities pertaining to renal function were screened by identification of subjects in placebo-controlled studies who had BUN or creatinine within normal limits at baseline but increased 1.2-fold from baseline at study end. For such subjects, BUN and creatinine values were abstracted for further examination.

Only 2 subjects were identified as having potentially clinically significant increases in BUN or creatinine during placebo-controlled studies. One subject on placebo⁴ had no change in creatinine (0.81 mg/dL at baseline and 0.83 at study end) but BUN went from 50 to 114. One subject on sildenafil⁵ progressed from a creatinine of 1.1 to 1.5 mg/dL; BUN was 20 at study end.

8.2.4.3. Electrolytes, hematology, etc.

Significant changes in electrolytes, creatine kinase, and hematologic parameters were assessed by counting subjects on placebo and sildenafil with fractional shifts from baseline exceeding a parameter-specific amount. The thresholds were chosen, in part to detect a change of potential clinical significance and in part to select a small percentage of placebo subjects to optimize detecting a sildenafil-placebo difference.

Potentially clinically significant shifts in electrolytes and creatine kinase during placebo-controlled studies are shown in Table 37 below. Shifts in hematologic parameters are shown in Table 38 below. Of these, the only laboratory parameter for which further investigation appeared to be appropriate was calcium: there is at least a trend for subjects on sildenafil to be less likely to have an increase in calcium and more likely to show a decrease.

Because of the apparent trend for a reduction in calcium in the preceding analysis, a second analysis was undertaken to look for systematic difference in calcium levels as

^{3.} Study 101 subject 95020019 and study 102 subject 95000286.

⁴ Study 359 subject 700140.

^{5.} Study 101 subject 95110096.

Table 37. Potentially clinically significant shifts in electrolytes in placebocontrolled studies.

				Sildenafil N=2510				The second secon		Sildenafil N=2510	
		n	%	'n	%			'n	%	n	%
Sodium	↑5% ↓5%	7 7	0.5 0.5	5 10	0.2 0.4	Calcium	↑10% ↓10%	40 17	3.0 1.3	51 68	2.0 2.7
Potassium	↑10% ↓10%		9.4 10	252 268	10 11	Creatine kinase	↑10% ↓10%		14 14	364 401	15 16

Table 38. Potentially clinically significant shifts in hematologic parameters in placebo-controlled studies.

				Silde N=2				400000000000000000000000000000000000000		Silde N=2	
		n	%	n	% -			ń	%	n	*%
Hematocrit	↑10% ↓10%	34 59	2.5 4.4	63 134	2.5 5.3	WBC	↑50% ↓50% ↓75%	74 9 2	5.5 0.5 0.1	114 31 3	4.5 1.2 0.1
Hemoglobin	↑10% ↓10%	30 21	2.2 1.6	71 34	2.8 1.4	Neutrophil	↑50% ↓50% ↓75%	114 25 5	8.9 1.9 0.4	217 47 7	8.6 1.9 0.3
RBC	↑10% ↓10%	78 41	5.8 3.1	291 65	12 2.6	Platelets	↓50% ↓75%	2	0.1	2	0.1

a function of dose. Because dose information was not available in the integrated datasets, this analysis was performed on a dataset formed from laboratory data from the 4 placebo-controlled studies for which full data were available. The analysis used the sponsor-identified baseline values and the last on-treatment value available for each subject, ignoring differences in the period of follow-up specified in the protocol design. The result is shown in Table 39 below. There is no evidence of an effect on mean calcium levels at any dose, and no dose-related trend.

Table 39. Relationship between dose at calcium level (Studies 102, 103, 363, and 364).

	Placebo	Sildenafil (mg)						
	N=1052		-50 N=360	1 3 3 3 7 7 6 6 6 7				
Baseline	9.1±0.5	9.1±0.5	9.0±0.4	9.1±0.5				
On treatment Range		9.1±0.5 6.9–10.6	9.2±0.4 8.1–10.2	9.2±0.4 8.4–10.4				

8.2.4.4. Vital signs

The sponsor evaluated median changes in vital signs in placebo-controlled phase II and II studies together and then looking at median changes in subjects on anti-anginal drugs—nitrates, β -blockers, calcium channel blockers, and potassium channel activators. These results are summarized in Table 40 below.

The reviewers computed mean changes in systolic and diastolic pressures and in pulse rate, for subjects in placebo-controlled studies. They also plotted vital signs at study

^{6.} Studies 102, 103, 363, and 364.

Table 40. Summary of median changes in vital signs in placebo-controlled studies.

		All	placebo	-contro	lled	All	placebo	-contro	lled	All placebo-controlled				
		Placebo		Sildenafil		Placebo		Sildenafil		Placebo		Sildenafil		
		Base	Δ	Base	Δ	Base	Δ	Base	Δ	Base	Δ	Base	Δ	
Sitting	N	1187		2200		18	187		353		471		847	
	Sys	130	0	130	0	140	0	140	-4	135	0	137	0	
	Dias	80	0	80	0	82	0	82	0	80	0	80	0	
	Pulse	72	0	72	0	72	0	72	0	72	0	74	0	
Standing	N	16		16		_		. ——		_		+		
	Sys	116	0	118	-6	_	_			_			_	
	Dias	80	-1	80	0		_	_	_	_	_			
	Pulse	72	7	79	4	_	_	_		_	_			
Supine	N	5	4	55				_						
	Sys	125	0	128	-3			_	_	_			_	
	Dias	80	0	80	0		_				-		_	
	Pulse	70	0	68	-1							_		

end against baseline values, for these same studies, to look for outliers. These analyses (not shown here) are consistent with the sponsor's analyses of median changes; any such effects are small. This result however, must be interpreted in the context that end-of-study measurements were likely often made many hours or days after the last dose of study drug. Other data, discussed in section 8.2.5.1 on page 54, is indicative of a potentially clinically significant effect of sildenafil on blood pressure.

Electrocardiograms were obtained within 24 hours of a dose in phase III Studies 148-102 and 148-106, which exposed subjects to doses from 25 to 200 mg. ECGs were obtained 40 minutes after dosing subjects receiving intravenous sildenafil in Study 148-203. Studies 148-001, 148-004, 148-201, and 148-201A exposed 4 to 10 subjects per dose to doses ranging from 1.25 to 800 mg, with ECGs obtained 1 hour after dosing, near the time of expected peak plasma levels. Data from the latter collection of studies are shown in Figure 6 below. The figure and the data from the study with intravenous administration are consistent with there being a small, clinically insignificant, dose-related effect of sildenafil on heart rate. None of the study designs permit comment upon the duration of this effect, other than it being undetectable at 24 hours after dosing.

8.2.4.5. ECG

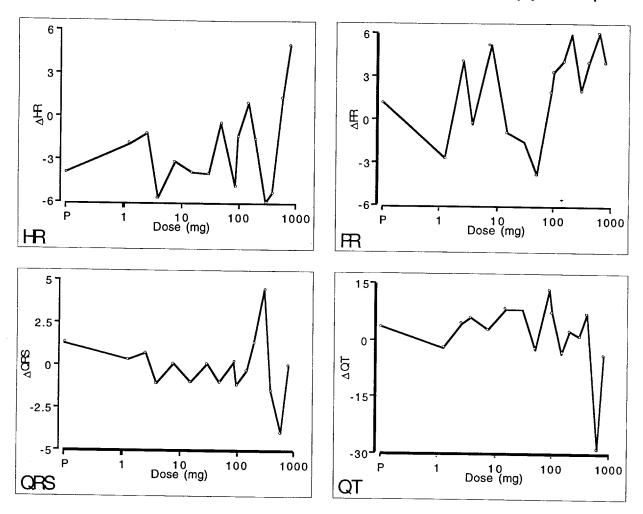


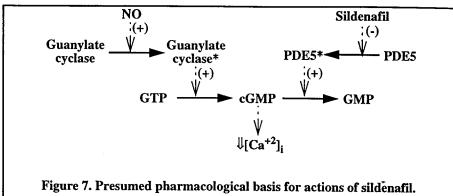
Figure 6. ECG data (Studies 148-001, -004, -201, and -201A.

8.2.5. Pharmacologic basis for safety issues

Sildenafil is a selective inhibitor of phosphodiesterase, an enzyme that catalyzes the cleavage of cAMP or cGMP. Different tissues have different forms of this enzyme, and these different forms have different affinities for sildenafil.

Sildenafil has the lowest IC $_{50}$ for PDE5—about 3 nM. PDE5 is found in the corpus cavernosum, platelets, skeletal muscle, and vascular and visceral smooth muscle. The IC $_{50}$ for PDE6, found in the retina, is about 30 nM. The IC $_{50}$ for other phosphodiesterases is 7 μ M (skeletal muscle PDE4) to 68 μ M (corpus cavernosum PDE2), with cardiac muscle PDE3 (involved in the action of milrinone and other inotropes) somewhere in between. Thus, sildenafil has a high degree of selectivity (~1000-fold) for PDE5 and PDE6.

The role of phosphodiesterase is illustrated (for vascular smooth muscle) in Figure 7 below. Endothelial receptors mediate activity of nitric oxide synthase. NO diffuses from endothelial cells (or comes from organic NO donors like glyceryl trinitrate) to smooth muscle cells where it activates guanylate cyclase. Guanylate cyclase catalyzes the formation of cGMP from GTP. Cyclic GMP is, in turn, broken to GMP by the action of phosphodiesterase. An increase in cGMP, resulting from inhibition of phosphodiesterase, causes a reduction in intracellular calcium, and that leads to relaxation of the smooth muscle cells. Similar mechanisms of control of intracellular calcium probably mediate actions of this system in other cells. On the basis of the proposed mechanism of action, relative affinities of sildenafil for different forms of phosphodiesterase, and the distribution of phosphodiesterase in



different tissues, there are effects of sildenafil that can be predicted. These effects include (a) penile erection resulting from relaxation of smooth muscle controlling inflow of blood to the corpus cavernosum, (b) systemic vasodilation and, possibly, hypotension, (c) inhibition of platelet aggregation and increased risk of hemorrhage, (d) skeletal muscle weakness, (e) reduced activity of the gastrointestinal tract, and (f) interference with vision. Each of the potential safety concerns is considered separately.

As shown in Study 148-204⁷, sildenafil produces peripheral vasodilation, and in phase III studies, where vital signs were not recorded in close association with dosing, sildenafil was associated with vasodilation as an adverse event more commonly than was placebo. Study 148-301⁸ was a study of acute hemodynamics of intravenous sildenafil in subjects with chronic ischemic heart disease (not erectile dysfunction). There, sildenafil administration was associated with a blood pressure reduction from baseline of 12/11 mmHg, accompanied by a 10% increase in heart rate⁹. Study of sildenafil (25 mg tid) with glyceryl trinitrate¹⁰ showed a baseline- and placebo-subtracted effect on blood pressure attributable to sildenafil of -15/-5 mmHg with little effect on heart rate. Study of sildenafil (single 100-mg dose) and amlodipine¹¹ produced peak placebo- and baseline-subtracted effects on blood pressure of -8/-6 mmHg supine and -11/-9 mmHg standing, again with little effect on heart rate.

Sildenafil doses of 800 mg were associated with transient, potentially clinically significant reductions in blood pressure and increases in heart rate in normal male volunteers, as shown in Study 148-004¹². There was one case of syncope in this study. Available data are not adequate to establish the full dose-response relationship for the effects of sildenafil on blood pressure; hypotension may be the most serious potential adverse effect associated with overdosage.

Sildenafil was otherwise uncommonly associated with symptoms of orthostatic hypotension or with syncope.

8.2.5.1. Vital signs

^{7.} Study 148-204: An open study in normal volunteers to investigate the effects of an escalating brachial artery infusion of UK-92,480 on forearm blood flow and forearm venous compliance. on page 133.

^{8.} Study 148-301: An open single intravenous dose study of the haemodynamic effects of UK-92,480 (sildenafil) in patients with stable ischaemic heart disease. on page 181.

^{9.} It was also accompanied by a 20% reduction in cardiac output. Systemic vascular resistance was not calculated, but, by implication, it must have increased. Most likely the cardiac output values are in error, since there is other evidence of systemic vasodilation.

^{10.} Study 148-209: A double blind, randomised, placebo controlled, two-way crossover study to examine the effects of 25mg tid UK-92,480, administered as capsules, on the haemodynamic responses to glyceryl trinitrate in normal volunteers. on page 141.

^{11.} Study 148-225: A double-blind, placebo controlled, two way crossover study to investigate the effects of a single dose of sildenafil (100 mg) on blood pressure in subjects with essential hypertension being treated with amlodipine. on page 162.

^{12.} Study 148-004: Phase I investigator-blind, placebo-controlled, evaluation of safety, toleration, and pharmacokinetics of sildenafil following escalating single oral doses in healthy male volunteers. on page 96.

8.2.5.2. Hemorrhage

The sponsor undertook several clinical trials pertinent to assessing the risk of hemorrhage with sildenafil. Bleeding time and platelet aggregation ¹³ in response to ADP was assessed in Study 148-206¹⁴, 2, 8, and 12 hours after placebo or sildenafil 50 mg. There was no effect bleeding time and no direct effect of sildenafil on platelet aggregation. However, sildenafil produced a 10-fold decrease in the IC₅₀ for sodium nitroprusside.

8.2.5.3. Weakness

Weakness was not formally assessed in the clinical development program (and perhaps it is not true that inhibition of PDE5 lowers intracellular calcium in skeletal muscle or that lowering intracellular calcium leads to weakness. Weakness was reported as an adverse event by fewer than 1% of subjects on sildenafil.

8.2.5.4. Decreased gastrointestinal motility

Gastrointestinal motility was not formally assessed in the clinical development program (and perhaps it is not true that inhibition of PDE5 lowers intracellular calcium in visceral muscle or that lowering intracellular calcium leads to decreased motility. Gastrointestinal symptoms were more commonly reported on sildenafil (14%) than on placebo (6.6%) in studies with flexible-dosing schedules. Specific symptoms more common on sildenafil than on placebo included dyspepsia (6.5 vs. 1.7%), diarrhea (2.0 vs 1.0%), nausea (1.2 vs. 0.4%), and tooth disorder (1.1 vs. 0.8%), none of which are easy to associate with the pharmacological mechanism.

8.2.5.5. Vision abnormalities

Because of novel adverse events pertaining to abnormalities in vision, the sponsor performed 2 studies with a battery of tests of visual acuity, contrast sensitivity, color discrimination, pupillometry, electroretinography, photostress, and visual fields. Study 148-223¹⁵ was a single-dose crossover study with doses 50, 100, and 200 mg, and placebo. Study 148-232¹⁶ was a crossover study of placebo and sildenafil 200 mg. These studies demonstrated a dose-related effect of sildenafil on color discrimination, probably restricted to the blue-green part of the spectrum. The effect was manifest particularly 1 to 2 hours after dosing, around the time of the peak plasma levels. Electroretinograms demonstrated a reduced amplitude response to blue light coincident with the color discrimination impairment and presumably a manifestation of the same defect. Study 232 included a cohort of subjects with diabetic retinopathy, but these results were not reported with the NDA.

The clinical significance of effects on vision cannot be unambiguously determined from these data. The effects appear to be short-lived and without collateral effects on aspects of vision which might lead to accidents.

8.3. Summary of key safety findings

- The safety data collected with the sildenafil development program was adequate
 in terms of doses studied, dosage schedules, duration of exposure, total number
 of subjects exposed, and special studies performed, to allow the usual level of
 confidence in an assessment of the risks of sildenafil for its proposed indication.
- There was one death, a suicide, on placebo. There were 8 deaths on sildenafil or within 30 days of treatment. There were 2 deaths of non-cardiovascular causes: One was a metastatic bladder carcinoma—in which a role of study drug is not plausible. The other was a death associated with a fall, cerebral hemorrhage, and pulmonary sepsis, in a subject with pre-existing arrhythmia; a role of study

^{13.} Platelets can be induced to aggregate in vitro with ADP. ADP-mediated platelet aggregation can be inhibited in a dose-related manner by the nitric-oxide donor sodium nitroprusside. The effect of sildenafil was assessed by the effect on the dose-response curve for sodium nitroprusside.

^{14.} Study 148-206: A single blind, two way crossover, placebo controlled pilot study to investigate the effects of UK-92,480 (sildenafil) on platelet function in normal male volunteers. on page 134

^{15.} Study 148-223: A double-blind, randomised, placebo controlled, four period crossover study to assess the effect of orally administered sildenafil (50, 100 and 200mg) on visual function in healthy male volunteers. on page 160.

^{16.} Study 148-232: A randomised, double-blind, placebo-controlled, crossover pilot study to investigate the effects of a single oral tablet dose of sildenafil (200mg) on visual function (electroretinogram, photostress, visual field and colour discrimination tests) in healthy male volunteers and patients with diabetic retinopathy. on page 177.

- drug cannot be excluded. Four subjects died from myocardial infarctions, 3 of whom had pertinent histories or evident risk factors. One was a post-operative death in a subject with pre-existing heart failure, and one was a peri-operative death in a study of chronic stable angina. Thus, a small number of deaths might represent increased cardiovascular risk associated with sildenafil.
- Increased cardiovascular risk was not apparent from withdrawals from studies
 for arrhythmias or myocardial infarctions—despite smaller numbers of subjects
 and lower periods of exposure, there were more such withdrawals on placebo.
 Nor was risk evident in comparisons of overall cardiovascular event rates, ECG
 data, or vital signs.
- Rates of withdrawal from placebo-controlled studies were lower for subjects randomized to sildenafil than for subjects randomized to placebo, with most of the difference attributable to withdrawals for lack of effectiveness. Rates of withdrawal for adverse events were similar on placebo and sildenafil.
- Rates of withdrawal from open-label extensions were quite low—about 10%, with lack of effectiveness being the most common cause.
- The most common adverse event resulting in withdrawal was headache, and
 this was much more common on sildenafil than on placebo. Adverse events
 were an uncommon cause for withdrawal from open-label extensions, but
 among such withdrawals, headache was not uncommon.
- Adverse events reported 'significantly' more commonly on sildenafil than on
 placebo included headache, vasodilation, dyspepsia, and visual disturbances.
 All of these can plausibly be linked to pharmacological properties of sildenafil.
 For the most part, they appear to be dose-related.
- Careful study of blood pressure in the setting of another blood pressure-lowering agent—nitroglycerin or amlodipine—reveals a potentially clinically significant further reduction of blood pressure caused by sildenafil. This effect develops and declines with a time course of hours, similar to the time course of plasma levels of sildenafil after a dose. Although this effect was not associated with symptomatology in trials that included subjects on antihypertensive agents, it remains a safety concern.
- Other adverse events bearing apparent relationship to sildenafil—headaches, dyspepsia, vasodilation, and vision abnormalities—appear to be nuisances of short duration, sufficient to be dose-limiting, but they are not safety concerns. In particular, the vision disturbance has been fairly well characterized, and it does not appear to pose a risk to men operating motor vehicles or other heavy equipment.
- A few effects of sildenafil were expected on the basis of the distribution of phosphodiesterase or observed effects in animals but were missing from the safety experience. Phosphodiesterase inhibition in visceral smooth muscle predictably produced lower gastrointestinal motility in animals, but was without obvious symptomatology, except, perhaps, dyspepsia, in man. Phosphodiesterase inhibition in platelets did not appear to increase the risk of hemorrhage in man or animals.