CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

20-066/S010

ADMINISTRATIVE DOCUMENTS

Meeting Minutes

Memorandum of Telecon

Meeting Date: July 10th @ 930 AM
Location: S200A Corporate

NDAs: ~~20-066/S-010 Nicorette 4mg Gum~~
18-612/S-028 Nicorette 2mg Gum

Type of Meeting: Negotiations with sponsor concerning labeling issues associated with the aproveable letters issued June 20, 2000

External Attendees & Titles
David Schifkovitz, Director, Regulatory Affairs, SKB Consumer Healthcare
Ron Jesiolowski, SKB Consumer Healthcare

FDA Attendees (DOTCDP- HFD 560)
L. Katz, Deputy Director
C. Martin, Interdisciplinary Scientist
D. Keravich, Project Manager
H. Cochran, Team Leader
M. Robinson, Interdisciplinary Scientist

Meeting Objective
To finish label negotiations required for an approval letter.

Summary
A conference call was scheduled to negotiate label changes reflected in the June 22, 2000 Approvable Letter for Nicorette Orange 2 mg and 4 mg. It was that the chemistry issues concerning the expiration dating for the 2 mg that were listed on the approveable letter would be addressed in a separate TELECON with ONDC later.

Text changes for the 2 mg and 4 mg cartons, User's Guide and Audio Tape were each reviewed. SB agreed to make all changes outlined in the June 22 letter. These changes include:

(1) Standardizing dosage selection and alternate dose around 25 cigarettes per day. It will now read [redacted] and "less than 25".

(2) Adding "the" before "trash" in the "keep out of reach of children" statement.

(3) Change the User's Guide to include moving the start of subheading, "Ask a doctor before use if you have" to the top of page 5, and changing sequence of information under "Let's Get Started" heading.

(4) Sponsor agree to removing lines with reference to "heavier smokers" on page 11 of the Users's Guide and page 4 Audio Tape script in paragraph 8, sentence 4.

(5) The layout changes for the 48 count carton were discussed next. Agency agreed that the 48 count carton meets requirements for the use of a modified Drug Facts layout.

Formatting issues for both NDA's were then addressed using the modified format. Discussions were focused on what options could be used on formatting the contents of drug facts on the carton. Examples were provided by the sponsor on July 6, 2000 via fax and by the agency. It was agreed that the sponsor could utilize a 3 panel layout with Drug Facts starting on the side panel. The agency requested that all bullets be left-justified to help readability. The agency recommended a vertical placement of PDP text. Sponsor was concerned about problems with shelf placement at which point the agency stated that this was not a critical issue and up to the sponsor.

The sponsor requested agreement that these changes were minor/editorial in nature and proposed approval of 4 mg Nicorette Orange NDA with submission of revised labeling as discussed and use of labeling submitted in February 21, 2000 Supplement. Sponsor also would commitment to implement labeling changes within 180 days. The agency agreed to this proposal pending receipt of the revised labeling and a suggestion that a 90 day time period for implementation may be stipulated in the approval letter.

The meeting ended amiably.

Minutes Prepared by D. Keravich /S/

NDA 20-066
NDA 18-612
HFD-560 Division Files
HFD-560 Ganley/Katz/Cothran/Keravich/Robinson

CENTER FOR DRUG EVALUATION AND RESEARCH
FOOD AND DRUG ADMINISTRATION

FACSIMILE TRANSMISSION RECORD

DATE: 9-19-00

FROM: Daniel P. Keravich, M.S., M.B.A.
Division of OTC Drug Products, HFD-560

PHONE: 301-827-2248 FAX: 301-827-2316 or
301-827-2315

TO: David Shifkovitz
SKB Consumer Healthcare

FAX #: 973-889-2244 No. Of Pages (including cover) __1__

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Message: Please refer to your supplemental new drug application NDA 20-066/S-010 dated July 10, 2000 submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Nicorette® 4 mg gum.

In order to ensure a timely action for this supplemental new drug application, we request that you provide a commitment letter immediately. Please submit a letter of commitment that states the following:

1. The labeling dated July 10, 2000 will be implemented within 90 days of the approval date of NDA 20-066/S-010.

If you have any questions, please contact Daniel P. Keravich, M.S., M.B.A., Regulatory Project Manager, at 301-827-2248.

cc: Original N-20-066
HFD-560/Div. File
HFD-560/Keravich/Cook/Cothran/ Robinson/ Chin/Ganley/Katz

Electronic Mail Message

Date: 6/21/00 4:24:40 PM
From: David.J.Schifkovitz (David.J.Schifkovitz@sb.com)
To: keravichd (keravichd@A1)
Subject: Response to June 20 FAX

Dan,
I thought this might work better than a FAX. I've attached a Word document that is our response. A separate email contains pdf files as examples of some of the different layouts and space problems we encountered in drafting the 48 count (refill) packages with Drug Facts. As a reminder, current Original and Mint have less text and did not include the subheadings required by Drug Facts. All of this has added additional space requirements.
Thanks for all your help,
Dave
(See attached file: June 20.doc)

F-16 20-066

CENTER FOR DRUG EVALUATION AND RESEARCH
FOOD AND DRUG ADMINISTRATION

FACSIMILE TRANSMISSION RECORD

DATE: June 20, 2000

FROM: Daniel P. Keravich, RPh. MS. MBA
Division of OTC Drug Products, HFD-560

JUN 20 2000

PHONE: 301-827-2248 FAX: 301-827-2316 or
301-827-2315

TO: SmithKline Beecham Consumer Healthcare
Attention: Mr. David Schifkovitz

Phone# 973-889-2509

FAX #: 973—889-2390 No. Of Pages (including cover) 5

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Message: Please refer to your supplemental new drug application NDA 20-066/SCF-010 and NDA 18-612/SCF-028, dated February 22, 1999, received February 23, 1999, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Nicorette™ (nicotine polocrilex) 4mg orange flavor gum and Nicorette™ (nicotine polocrilex) orange flavored 2mg gum.

Please find attached product labeling comments to be incorporated into the carton label, back panel, user's guide and audio-tape as applicable.

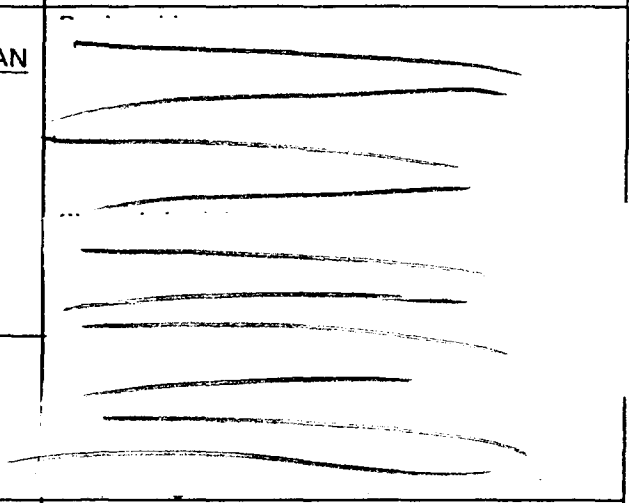
1. In order to ensure a timely action for this supplemental new drug application, we request that you submit revised draft labeling that incorporates the revisions specified on the attachments. We appreciate your expedited response.

2. Please provide justification for the use of modified "Drug Facts" Labeling format.

If you have any questions, please contact Daniel Keravich, RPh., MS., MBA., Regulatory Project Manager, at 301-827-2248.

NDA 20-066/SCF-010

Carton Front 4 mg Starter Kit and refill (attachment 1, pages 35 and 37)

Paragraph 21 CFR	Description of Paragraph	Comments
201.60	Principle Display Panel	
	Statement, 4 mg cartons: "FOR THOSE WHO SMOKE MORE THAN 24 CIGARETTES A DAY"	
	"IF YOU SMOKE LESS THAN 25 CIGARETTES A DAY; try Nicorette 2 mg"	
211.132(c)	Tamper-Evident statement --Refill Carton bottom (page 37).	On the 4 mg refill cartons (bottom panel), the sentence **"Do not use if individual seals are open or torn"** needs to be placed more prominently, so that consumers are alerted to the specific tamper-resistant feature of the package (§ 211.132(c)(ii)).
201.63	Pregnancy/breast feeding warning	See Back Panel, § 201.66 (c)(5), below.
201.17	Location of expiration dates	The location of the expiration date needs to be identified in accordance with § 201.17 for the cartons.
201.18	Control numbers	The location of the lot number needs to be identified in accordance with § 201.17 for the cartons.

Back Panel (attachment 1, pages 36 and 37)

Paragraph § 201.66	Description of Paragraph	Comments
(c)(1)	Back Refill carton, Drug Facts, Drug Facts (continued). NOTE: 1. § 201.66(d)(10) states that the modified drug facts format may be used if the required FDA information exceeds 60% of the total surface area available to bear labeling. 2. § 201.66(d)(5) states that the continuation of the required content and format onto multiple panels must retain the required order, etc.,	1. The sponsor needs to justify the use of the modified "Drug Facts" format. 3. For consistency with other drug labeling and the promotion of consumer familiarity with "Drug Facts," it is suggested that the labeling start on the back of the carton rather than on the side of the carton. However, it is suggested that columns be used if point type specifications can meet § 201.66 requirements. For example, the Principal display panel could be rotated 90 degrees, followed by "Drug Facts" in column format on the adjacent panels.

Paragraph § 201.66	Description of Paragraph	Comments
(c)(5)	(ix) The pregnancy/breast feeding warning	The agency is currently reviewing its position concerning pregnancy and breast-feeding warnings of nicotine products. Please use current warning.
(c)(5)	(x) Keep out of reach of children warning	Sentence 3: insert the word "the" before the word "trash."
(c)(6)	**Directions** -- bullet 6, sentences 2 through 5.	Insert bullets as indicated before the sentences: ▪ chew the gum slowly until it tingles. Then park it between your cheek and gum. When the tingle is gone, begin chewing again, until the tingle returns. ▪ repeat this process until most of the tingle is gone (about 30 minutes) ▪ do not eat or drink for 15 minutes before chewing the nicotine gum, or while chewing a piece

User's Guide (attachment 1, pages 41-54)

Page(s)	Description of Paragraph	Comments
43, (User's Guide pages 4 and 5	Subheading: **"Ask a doctor before use if you have"**	We suggest that you do not separate the subheading from the warnings on page 5.
43, (User's Guide page 6)	Heading "Let's Get Started," paragraph 1: "Your first step is to read through the entire User's Guide carefully and check that you bought the right starting dose. **If you smoke 25 or more cigarettes a day,** use 4 mg nicotine gum. **If you smoke less than 25 cigarettes a day, use 2 mg nicotine gum.**	Revise to read: "First, check that you bought the right starting dose. **If you smoke 25 or more cigarettes a day,** use 4 mg nicotine gum. **If you smoke less than 25 cigarettes a day, use 2 mg nicotine gum.** Next, read through the entire User's Guide carefully. Then, set your. . ."
47, (User's Guide page 11)	Paragraph following chart, sentence 2: "Heavier smokers may need more pieces to reduce their cravings."	Delete this sentence.

AUDIO TAPE SCRIPT

Page(s)	Description of Paragraph	Comments
58,	Paragraph 8, LEADER, sentence 4: "Heavy smokers might need to go all the way up to 24 pieces a day."	Delete this sentence.

Reviewer's Recommendations

1. It is strongly recommended that the language used in the user's guide, audio tape script and "Drug Facts" labeling be the same and consistent with other Nicorette gum flavors.

2. The sponsor stated that the words "NEW FLAVOR" on the front of the carton would be removed after 6 months of marketing. This is acceptable.

cc: Original N18-612/SCF-028
Original N 20-066/SCF-010
HFD-560/Div. File
HFD-560/KeravichD/Cook/Cothran/ Ganley

Labeling Review SEP 18 2000

NDA No. 20-066/SCF-010
Drug Product: Nicorette Orange

Active Ingredient: nicotine polacrilex gum, 4 mg
Indications: reduces withdrawal symptoms, including nicotine craving, associated with quitting smoking

Sponsor: SmithKline Beecham Consumer Healthcare
Type of Submission: SCF/Response to Approvable Letter

Date of Submission: July 10,2000
Date Filed: July 12, 2000
Date of Review: 8/23/00
Reviewer: Mary S. Robinson, HFD-560, Division of OTC Drug Products
Project Manager: Daniel Keravich

Reference is made to the approvable letter (NDA 20-066/SCF-010) dated June 22, 2000 (Attachment 1) and the teleconference call of July 10, 2000 for Nicorette Orange Gum (nicotine polacrilex gum, 4 mg). On July 10, 2000, in response to the Agency's approvable letter, SmithKline Beecham submitted full color printed mock-up labeling for Orange (citrus) Flavored Nicorette 4 mg gum carton and the refill carton, audio transcript (starter pack only), and User's Guide (attachment 2).

Reviewer's Comments. The labeling revisions submitted are in accordance with the Agency's requested revisions discussed in the June 22, 2000 approvable letter and the July 10, 2000 teleconference.

The sponsor needs to implement these changes within 90 days of approval as agreed upon during the July 10, 2000 telecon, thus allowing use of labeling produced for product launch that was included in the February 21, 2000 submission.

The sponsor should be reminded that the flag "New Flavor" needs to be removed after six months of marketing.

Reviewer's Recommendations. The above comments can be conveyed to the sponsor.

/S/ 8/24/00
Mary S. Robinson, M.S.
Regulatory Review Chemist, HFD-560

/S/ 9/14/00
Helen Cothran, B.S.
Team Leader, HFD-560

/S/
Linda M. Katz, M.D., M.P.H. 9/18/00
Deputy Director, HFD-560

Attachments

cc: NDA 20-066/SCF-010
HFD-170: Milstein
HFD-560: Ganley/Katz/Cothran/Chin/Robinson/Keravich/Prescott (team 4 binder with labeling)
HFD-560: Division File
R/D: MRobinson
F/T: MRobinson
Doc ID:

2 page(s) of revised draft labeling has been redacted from this portion of the review.