

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:
NDA 20-164/S-005

Name: Lovenox® (Enoxaparin Sodium) Injection

Sponsor: Rhone-Poulenc Rorer Pharmaceuticals

Approval Date: January 30, 1996

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 20-164/S-005

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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 20-164/S-005

APPROVAL LETTER

JAN 30 1996

NDA 20-164/S-005

Rhone-Poulenc Rorer Pharmaceuticals
Attention: Ronald F. Panner
500 Arcola Road
Collegeville, PA 19426-0107

Dear Mr. Panner:

Please refer to your December 19, 1995 supplemental new drug application submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Lovenox (enoxaparin sodium) Injection.

The supplemental application, submitted as "Special Supplement - Changes Being Effectuated" under 21 CFR 314.70(c), provides for revisions to the WARNINGS and ADVERSE REACTIONS sections of the package insert regarding the potential for adverse events when epidural anesthesia and/or epidural catheters are used.

We have completed the review of this supplemental application and have concluded that adequate information has been presented to demonstrate that the drug is safe and effective for use as recommended in the final printed labeling submitted on December 19, 1995. Accordingly, the supplemental application is approved effective on the date of this letter.

In addition, please submit three copies of the introductory promotional material that you propose to use for this product. All proposed materials should be submitted in draft or mock-up form, not final print. Please submit one copy to this Division and two copies of both the promotional material and the package insert directly to:

Food and Drug Administration
Division of Drug Marketing, Advertising and
Communications, HFD-240
5600 Fishers Lane
Rockville, Maryland 20857

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, please contact:

Karen Oliver
Consumer Safety Officer
(301) 443-0487

Sincerely yours,

Stephen B. Fredd, M.D.
Director
Division of Gastrointestinal and
Coagulation Drug Products
Office of Drug Evaluation III
Center for Drug Evaluation and
Research

cc:

Original NDA 20-164/S-005
HFD-180/Div. files
HFD-180/CSO/K.Oliver
HFD-180/S.Fredd
HFD-180/L.Talarico
HFD-103/P.Botstein (with labeling)
HFD-101/L.Carter
DISTRICT OFFICE
HF-2 (with labeling)
HFD-80 (with labeling)
HFD-40/DDMAC (with labeling)
HFD-613 (with labeling)
HFD-735/(with labeling) - for all NDAs and supplements for
adverse reaction changes.
HFD-560/D.Bowen (with labeling - for OTC Drug Products
Only)

drafted: KO/January 26, 1996

final: KO/01/26/96/c:\wpwin\karenfil\nda\20164601.2ko

APPROVAL

K. Oliver 01/26/96
SP 1/29/96

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 20-164/S-005

LABELING

Lovenox® (enoxaparin sodium) Injection

APPROVED

IN-11077H

JAN 30 1996

REV. 11/95

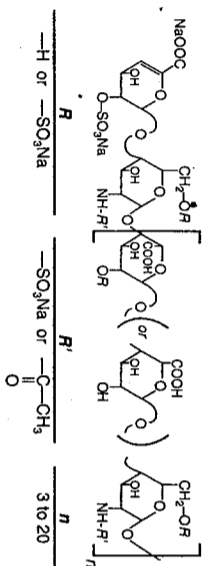
DESCRIPTION

Lovenox® (enoxaparin sodium) Injection
Enoxaparin sodium is a sterile, low molecular weight heparin for injection. Each syringe contains 30 mg enoxaparin sodium in 0.3 mL water for injection. The approximate anti-Factor Xa activity per syringe is 5000 U (with reference to human plasma) and is equivalent to 100 mg of unfractionated heparin. The solution is preservative-free and intended for use only as a single-dose injection.

Enoxaparin is obtained by alkaline degradation of heparin benzyl ester derived from porcine intestinal mucosa. Its structure is characterized by a 2-O-sulfate-6-O-phosphoryl-sulfonate acid group at the non-reducing end and a 2-N,6-O-disulfate-D-glucosamine at the reducing end of the chain. The substance is the sodium salt. The average molecular weight is about 4500. The molecular weight distribution is:

<2000 daltons 5.20%
2000 to 8000 daltons 2.89%
>8000 daltons 5.15%

STRUCTURAL FORMULA



CLINICAL PHARMACOLOGY

Enoxaparin is a low molecular weight heparin which has antithrombotic properties. In man enoxaparin is characterized by a low molecular weight (MW) and a high degree of sulfation. The approximate anti-Factor Xa activity per syringe is 5000 U (with reference to human plasma) and is equivalent to 100 mg of unfractionated heparin. Following the administration of a single subcutaneous dose of up to 50 mg of enoxaparin to healthy subjects, no appreciable change was observed in fibrinogen level and other parameters of fibrinolysis. At the recommended doses, single injections of enoxaparin do not significantly influence platelet aggregation or effect global clotting tests (i.e. prothrombin time [PT] or activated partial thromboplastin time [APTT]).

Pharmacodynamics

Maximum anti-Factor Xa and antithrombin (anti-Factor IIa) activities occur 3 to 5 hours after subcutaneous injection of enoxaparin. Mean peak anti-Factor Xa activity was 0.18 U/mL (1.58 µg/mL) and 0.35 U/mL (3.83 µg/mL) after the administration of 30 mg and 40 mg enoxaparin, respectively, to healthy volunteers. The volume of distribution of anti-Factor Xa activity is 92% in healthy volunteers. The volume of distribution of anti-Factor Xa activity is about 5 L. Following i.v. dosing, the total body clearance of enoxaparin is 25 mL/min. Elimination half-life based on anti-Factor Xa activity was about 4.5 hours after subcutaneous administration. Following a 40 mg dose significant anti-Factor Xa activity persists in plasma for about 12 hours. There appears to be no appreciable increase in anti-Factor Xa activity after dosing for 3 days in young healthy subjects. Clearance and C_{max} derived from anti-Factor Xa values following multiple doses were similar in young and elderly subjects. An increase of 25% in the area under anti-Factor Xa activity versus time curve was observed following once daily dosing in healthy elderly subjects for 10 days. The kinetics of anti-Factor Xa activity in anuric patients undergoing dialysis are similar to those in historical control normal subjects following i.v. dosing.

The decline of anti-Factor Xa activity with time was parallel to the decay curve of plasma total radioactivity (^{35}S) in healthy volunteers. Following intravenous dosing of enoxaparin labeled with the gamma-emitter, ^{35}S , 40% of radioactivity and 5-20% of anti-Factor Xa activity were recovered in urine in 24 hours.

CLINICAL TRIALS

Lovenox has been shown to prevent postoperative deep vein thrombosis (DVT) following hip or knee replacement surgery. In a double-blind study, Lovenox 30 mg q12h sc was compared to placebo in hip replacement patients. Treatment was initiated within 12-24 hours post-surgery and was continued for 10-14 days post-operatively.

Treatment Group	Lovenox		Placebo	
	30 mg q12h n (%)	40 mg q12h n (%)	30 mg q12h n (%)	40 mg q12h n (%)
All Treated Patients	50 (100%)	50 (100%)	50 (100%)	50 (100%)
Treatment Failures	5 (10%)*	1 (2%)**	23 (46%)	11 (22%)
Total DVT (%)	5 (10%)*	1 (2%)**	23 (46%)	11 (22%)
Proximal DVT (%)	0	0	1 (2%)	0
*p value versus placebo = 0.0002				
**p value versus placebo = 0.0134				
A double-blind, multicenter study compared three dosing regimens of Lovenox in hip replacement patients. Treatment was initiated within two days post-surgery and was continued for 7-11 days post-operatively.				

All Treated Patients	10 mg QD		30 mg QD		40 mg QD	
	n (%)	161 (100%)	n (%)	208 (100%)	n (%)	199 (100%)
Treatment Failures	40 (25%)	17 (11%)	22 (11%)*	8 (4%)	27 (14%)*	9 (5%)
Total DVT (%)	40 (25%)	17 (11%)	22 (11%)*	8 (4%)	27 (14%)*	9 (5%)
Proximal DVT (%)	17 (11%)	7 (4%)	8 (4%)	3 (2%)	9 (5%)	3 (2%)
*p value versus Lovenox 10 mg QD = 0.0068						
**p value versus Lovenox 10 mg QD = 0.0068						
There was no significant difference between the 30 mg BID and 40 mg QD regimens.						
In a double-blind study with 99 patients undergoing knee replacement surgery, Lovenox 30 mg q12h sc was compared to placebo. Treatment was initiated within two days post-surgery and was continued for 7-11 days post-operatively. The incidence of post-operative proximal and total deep vein thrombosis was significantly lower for enoxaparin compared to placebo.						

Treatment Group	Lovenox		Placebo	
	30 mg q12h n (%)	40 mg q12h n (%)	30 mg q12h n (%)	40 mg q12h n (%)
All Knee Replacement Patients	47 (100%)	52 (100%)	52 (100%)	52 (100%)
Treatment Failures	5 (11%)*	1 (2%)*	32 (62%)*	7 (13%)*
Total DVT (%)	5 (11%)*	1 (2%)*	32 (62%)*	7 (13%)*
Proximal DVT (%)	0	0	7 (13%)*	0
*p value versus placebo = 0.0001				
**p value versus placebo = 0.0018				
CL = Confidence Interval				
CL = Confidence Limit				

Additionally, in an open-label, parallel group, randomized clinical study in patients undergoing elective knee replacement surgery, Lovenox 30 mg q12h sc was compared to unfractionated heparin 5000 U q8h sc. Treatment was initiated post-operatively and continued up to 14 days. The incidence of deep vein thrombosis was significantly lower for enoxaparin compared to heparin.

INDICATIONS AND USAGE

Lovenox Injection is indicated for prevention of deep vein thrombosis, which may lead to pulmonary embolism, following hip or knee replacement surgery.

CONTRAINDICATIONS

Lovenox Injection is contraindicated in patients with active major bleeding. In patients with thrombocytopenia associated with a positive *in vitro* test for anti-platelet antibody in the presence of enoxaparin sodium, or in patients with hypersensitivity to enoxaparin sodium.

Patients with known hypersensitivity to heparin or pork products should not be treated with Lovenox Injection.

WARNINGS

Lovenox Injection is not intended for intramuscular administration. Lovenox cannot be used interchangeably (unit for unit) with unfractionated heparin or other low molecular weight heparins as they differ in their manufacturing process, molecular weight distribution, anti-Xa and anti-IIa activities, units and dosage. Special attention and compliance with the instructions for use specific to each proprietary medication is required to avoid overdosage.

Lovenox should be used with extreme caution in patients with a history of heparin-induced thrombocytopenia.

Hemorrhage

Lovenox Injection, like other anticoagulants, should be used with extreme caution in conditions with increased risk of hemorrhage. The risk of bleeding is increased in patients with active bleeding, recent surgery, or in patients treated concomitantly with platelet inhibitors.

Bleeding can occur at any site during therapy with enoxaparin. An unexplained fall in hematocrit or blood pressure should lead to a search for a bleeding site.

Neuraxial Anesthesia and Post-operative Indwelling Epidural Catheter Use

Spinal/Epidural Anesthetics. As with other anticoagulants, there have been rare cases of neuraxial hematomas reported with the concurrent use of enoxaparin and spinal/epidural anesthesia resulting in long-term or permanent paralysis. The risk of these rare events may be higher with the use of post-operative indwelling epidural catheters.

Thrombocytopenia: Thrombocytopenia can occur with the administration of Lovenox. Moderate thrombocytopenia (platelet counts between 100,000/mm³ and 50,000/mm³) occurred at a rate of 1.3% in patients given Lovenox, 2.0% in patients given heparin, and 1.7% in patients given placebo following hip or knee replacement surgery in clinical trials.

Platelet counts less than 50,000/mm³ occurred at a rate of 0.1% in patients given Lovenox, 0.5% in patients given heparin, and 0% in patients given placebo in the same trials. Thrombocytopenia of any degree should be monitored closely. If the platelet count falls below 100,000/mm³, enoxaparin should be discontinued. The rate of incidence of this complication in usual medical practice is unknown at present. The rate of incidence of this complication in usual medical practice is unknown at present.

PRECAUTIONS

General: Lovenox injection should not be mixed with other injections or infusions. Lovenox injection should be used with care in patients with renal insufficiency, uncontrolled arterial hypertension or a history of recent gastrointestinal ulcer or bleeding. Elderly patients and patients with renal insufficiency may show delayed elimination of enoxaparin. Enoxaparin should be used with care in these patients. Lovenox should be discontinued and appropriate if thrombotic events occur despite enoxaparin prophylaxis. Lovenox should be discontinued and appropriate therapy initiated.

Laboratory Tests: Periodic complete blood counts, including platelet count, and stool occult blood tests are recommended during the course of treatment with Lovenox injection.

Drug Interactions: It is recommended that agents which affect hemostasis be discontinued prior to Lovenox therapy as they may enhance the risk of hemorrhage. These agents include anticoagulants such as: oral anticoagulants, and/or platelet inhibitors including acetylsalicylic acid, NSAIDs (including ketorolac tromethamine), dipyridamol, or sulfipyrazone. If co-administration cannot be avoided and their use is essential, conduct close clinical and laboratory monitoring (see **Test Interactions**, **PRECAUTIONS**).

Drug/Laboratory Test Interactions: Elevations of Serum Aminotransferases

Asymptomatic increases in aspartate (AST [SGOT]) and alanine (ALT [SGPT]) aminotransferase levels greater than three times the upper limit of normal of the laboratory reference range have been reported in 1.3% of all subjects treated with Lovenox. Such elevations were generally transient and returned to normal within 7 days. In patients with weight elevations also been observed in patients and normal volunteers generally associated with increases in bilirubin. Since aminotransferase determinations are fully reversible, the differential diagnosis of myocardial infarction, liver disease and pulmonary emboli, elevations should be interpreted with caution.

Carcinogenesis, Mutagenesis, Impairment of Fertility: No long-term studies in animals have been performed to evaluate carcinogenic potential of enoxaparin. Enoxaparin was not mutagenic in Ames tests, including the Ames test, mouse lymphoma cell forward mutation test, and chromosomal aberration test and the *in vivo* rat bone marrow chromosomal aberration test. Enoxaparin was found to have no effect on fertility or reproductive performance of male and female rats at subcutaneous doses up to 20 mg/kg/day or 141 mg/m²/day. The maximum received human dose in clinical trials was 1.5 mg/kg/day or 48.4 mg/m²/day.

Pregnancy, Teratogenic Effects: Teratology studies have been conducted in rats and rabbits at subcutaneous doses of enoxaparin up to 30 mg/kg/day or 211 mg/m²/day, respectively. The maximum received human dose in clinical trials was 1.5 mg/kg/day or 48.4 mg/m²/day. There was no evidence of teratogenic effects or fetotoxicity due to enoxaparin. These studies are not always predictive of human response, this drug should be used during pregnancy only if clearly needed.

Non-teratogenic Effects: There have been a few spontaneous post-marketing reports of fetal death while using enoxaparin; none of the cases have been definitively associated with the use of this drug. In one case, a fetal death was associated with enoxaparin use in association with the fetal death. If enoxaparin is used during pregnancy, or if the patient becomes pregnant while taking this drug, the patient should be apprised of the potential hazard to the fetus.

Nursing Mothers: It is not known whether this drug is excreted in human milk. Because many drugs are excreted in human milk, caution should be exercised when enoxaparin is administered to nursing women.

Pediatric Use: Safety and effectiveness of enoxaparin in children has not been established.

ADVERSE REACTIONS

Hemorrhage: The incidence of hemorrhagic complications during Lovenox injection treatment has been low. The following rates of major bleeding events have been reported during clinical trials with Lovenox injection and heparin and placebo in patients undergoing hip or knee replacement surgery.

	Major Bleeding Episodes*		
	Enoxaparin 30 mg q12h n = 786	Heparin 15000 U/24h n = 541	Placebo n = 50
Hip Replacement Surgery	31 (4%)	32 (6%)	2 (4%)
Knee Replacement Surgery	n = 294 3 (1%)	n = 225 3 (1%)	n = 65 2 (3%)

* Bleeding complications were considered major if accompanied by a significant clinical event or if hemoglobin decreased by ≥ 2 g/dL or transfusion of 2 or more units of blood products was required.

Thrombocytopenia: During clinical trials with Lovenox® injection, moderate thrombocytopenia, defined as a platelet count between 100,000/mm³ and 50,000/mm³, occurred at a rate of 1.9% in patients given Lovenox, 2.0% in patients given heparin, and 1.7% in patients given placebo following hip or knee replacement surgery. Platelet counts less than 50,000/mm³ occurred at a rate of 0.1% in patients given Lovenox, 0.5% in patients given heparin, and 0.5% in patients given placebo. In clinical practice (see WARNINGS), mild local irritation, pain, hematoma and erythema may follow subcutaneous injection of Lovenox injection.

Other: Other adverse effects that were thought to be possibly or probably related to treatment with Lovenox injection, heparin or placebo in clinical trials with patients undergoing hip or knee replacement surgery, and that occurred at a rate of at least 2% in the enoxaparin group, are shown below.

Adverse Events Occurring at ≥ 2% Incidence in Enoxaparin Treated Patients*

Adverse Event	Enoxaparin 30 mg q12h n = 1080		Heparin 15000 U/24h n = 786		Placebo n = 115	
	Severe	Total	Severe	Total	Severe	Total
Fever	<1%	5%	<1%	4%	0%	3%
Hemorrhage	<1%	4%	1%	4%	0%	3%
Nausea	<1%	3%	<1%	2%	0%	2%
Hypochromic anemia	<1%	2%	<1%	2%	<1%	2%
Peripheral edema	<1%	3%	<1%	4%	0%	3%

* (Excluding Unrelated Adverse Events)

Opening Safety Surveillance: There have been rare reports of neuraxial hematoma formation with concurrent use of enoxaparin and spinal/epidural anesthesia, and post-operative indwelling catheters. These events resulted in varying degrees of neurologic injuries including long-term or permanent paralysis.

OVERDOSAGE:

SYMPTOMS/TREATMENT: Accidental overdosage following administration of Lovenox injection may lead to hemorrhagic complications. This may be largely neutralized by the slow intravenous injection of protamine sulfate (1% solution). The dose of protamine sulfate should be equal to the dose of Lovenox injection injected. 1 mg protamine sulfate per 1 mg of Lovenox injection may be administered. If the APTT remains elevated, a second injection of 0.5 mg protamine sulfate per 1 mg of Lovenox injection may be administered. However, even with higher doses of protamine, the APTT may remain more prolonged than under normal conditions found following administration of conventional heparin. In all cases, the anti-Factor Xa activity is never completely neutralized (maximum about 60%). Particular care should be taken to avoid overdosage with protamine sulfate. Administration of protamine sulfate can cause severe hypotensive and anaphylactoid reactions. Because of the potential for severe hypotensive and anaphylactoid reactions, protamine sulfate should be given only when resuscitative techniques are readily available. For additional information consult the labeling of Protamine Sulfate Injection, USP products.

A single subcutaneous dose of 46.4 mg/kg enoxaparin was lethal to rats. The symptoms of acute toxicity were ataxia, decreased motility, dyspnea, cyanosis and coma.

DOSSAGE AND ADMINISTRATION

Adult Dosage: In patients undergoing hip or knee replacement surgery, the recommended dose of Lovenox injection is 30 mg twice daily administered by subcutaneous injection with the initial dose given within 12-24 hours post-operatively provided hemostasis has been established. Treatment should be continued throughout the period of post-operative care until the risk of deep vein thrombosis has diminished. Up to 14 days administration has been well tolerated in all studied clinical trials. The average duration of administration is 7 to 10 days.

All studies should be screened prior to prophylactic administration of Lovenox to rule out a bleeding disorder. There is usually no need for daily monitoring of the effect of Lovenox in patients with normal presurgical coagulation parameters.

Administration:

Lovenox injection is administered by subcutaneous injection. It must not be administered by intramuscular injection. Subcutaneous injection techniques: Patients should be lying down and Lovenox injection administered by deep subcutaneous injection. To avoid the loss of drug, do not expel the air bubble from the syringe before the injection. Administration should be alternated between the left and right anterolateral and left and right posterolateral abdominal wall. The whole length of the needle should be introduced into a skin fold held between the thumb and

forefinger; the skin fold should be held throughout the injection. To minimize bruising, do not rub the injection site after completion of the injection.

Enoxaparin injection is a clear, colorless to pale-yellow sterile solution and as with other parenteral drug products should be inspected visually for particulate matter and discoloration prior to administration.

HOW SUPPLIED

Lovenox injection is available in packs of 10 prefilled syringes, NDC 0075-0924-30. Each Lovenox (enoxaparin sodium) prefilled syringe is affixed with a 26 gauge x 1/2 inch needle.

Lovenox contains 30 mg enoxaparin sodium in 0.3 mL of Water for Injection. Lovenox has an anti-Factor Xa activity of approximately 3000 IU (with reference to the W.H.O. First International Low Molecular Weight Heparin Reference Standard).

Lovenox injection should be stored at or below 25°C. Do not freeze.

Caution: Federal (U.S.A.) law prohibits dispensing without prescription.

Made in France

RHÔNE-POULENC ROGER PHARMACEUTICALS INC.

COLLEVILLE, PA 19420

IN-1107H



Printed on recycled paper

Rev. 11/95

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 20-164/S-005

LABELING REVIEW

Division of Gastrointestinal & Coagulation Drug Products

CONSUMER SAFETY OFFICER REVIEW

Application Number: 20-164/S-005

JAN 29 1996

Name of Drug: Lovenox (enoxaparin sodium) Injection

Sponsor: Rhone-Poulenc Rorer Pharmaceuticals

Material Reviewed

Submission Date(s): December 19, 1995

Receipt Date(s): December 21, 1995

Background and Summary Description: This supplement, submitted as "Special Supplement - Changes Being Effected" under 21 CFR 314.70(c), provides for revisions to the WARNINGS and ADVERSE REACTIONS sections of the package insert regarding the potential for adverse events when epidural anesthesia and/or epidural catheters are used. The sponsor has submitted final printed labeling (FPL) for the package insert.

Review

The submitted FPL, identified as "IN-1107H Rev. 11/95", was compared to the FPL approved in Supplement 002 on March 9, 1995, identified as "IN-1107F Rev. 4/95". The inserts are identical except for the following:

1. The configuration of the insert was changed from a double fold to a triple fold.

This editorial changed is ACCEPTABLE.

2. The code number was changed.

This change is ACCEPTABLE.

3. In the WARNINGS section:

- a. In the "Hemorrhage" subsection, the underlined words were deleted in the following sentence:
"Lovenox injection, like other anticoagulants, should be used with extreme caution in conditions with increased risk of hemorrhage, such as bacterial endocarditis, congenital or acquired bleeding disorders, active ulcerative and

angiodyplastic gastrointestinal disease, hemorrhagic stroke, or shortly after brain, spinal or ophthalmological surgery, in patients with indwelling intrathecal or epidural catheters, or in patients treated concomitantly with platelet inhibitors."

As per the January 19, 1996 MEDICAL OFFICER'S review, this deletion is ACCEPTABLE.

- b. A new subsection, titled "Neuraxial Anesthesia and Post-operative Indwelling Epidural Catheter Use" was added:

"Neuraxial Anesthesia and Post-operative Indwelling Epidural Catheter Use:
Spinal/Epidural Anesthesia: As with other anticoagulants, there have been rare cases of neuraxial hematomas reported with the concurrent use of enoxaparin and spinal/epidural anesthesia resulting in long-term or permanent paralysis. The risk of these rare events may be higher with the use of post-operative indwelling epidural catheters."

As per the January 19, 1996 MEDICAL OFFICER'S review, this addition is ACCEPTABLE.

2. In the ADVERSE REACTIONS section, a new subsection, titled "Ongoing Safety Surveillance" was added:

"Ongoing Safety Surveillance
There have been rare reports of neuraxial hematoma formation with concurrent use of enoxaparin and spinal/epidural anesthesia, and post-operative indwelling catheters. These events resulted in varying degrees of neurologic injuries including long-term or permanent paralysis."

As per the January 19, 1996 MEDICAL OFFICER'S review, this addition is ACCEPTABLE.

Conclusions

The submitted final printed labeling should be acknowledged and retained.

Karen Oliver, CSO 01/26/96
Karen Oliver
Consumer Safety Officer

cc:

Original NDA 20-164/S-005
HFD-180/Div. Files
HFD-180/
HFD-180/S.Fredd
HFD-180/L.Talarico

1/29/96
Concun
JF

draft: KO/January 25, 1996

r/d Initials: M.Walsh 01/26/96

final: KO/01/26/96/c:\wpwin\karenfil\rev\20164601.1ko

CSO REVIEW

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 20-164/S-005

MEDICAL REVIEW

02 34-1

DIVISION OF GASTROINTESTINAL AND COAGULATION DRUG PRODUCTS

MEDICAL OFFICER'S REVIEW

JAN 19 1996

NDA No.: 20-164
Sponsor: Rhone-Poulanc Rorer
Drug: Lovenox Injection (Enoxaparin sodium)
Indications: Thromboprophylaxis following hip or knee replacement surgery.
Submission: Special Supplement: Labeling Changes (Warning of neuroaxial hematomas).
Date of Submission: 12-19-1995
Date Received (CDER): 12-21-1995
Medical Reviewer: Lilia Talarico, M.D.
Date of Review: 1-18-1996

On March 9, 1995, the package insert for Lovenox (enoxaparin sodium) injection was revised to include the following information in the **WARNING** section: "Lovenox Injection, like other anticoagulants, should be used with extreme caution in condition with increased risk of hemorrhage such as ..., in patients with indwelling intrathecal or epidural catheters,....".

On 7-27-1995, the sponsor was asked to provide any additional information on the potential risks associated with epidural anesthesia and/or epidural catheters in patients receiving Lovenox thromboprophylaxis, including: 1) information on all reported cases of epidural hematomas in patients treated with enoxaparin, 2) background information on the overall risk of adverse events with the use of epidural/spinal anesthesia with or without thromboprophylaxis, 3) information on the overall use of enoxaparin and on the estimated use of enoxaparin with epidural anaesthesia in US and worldwide.

Eleven cases of epidural hematoma were identified from the worldwide postmarketing database as of 8-1-1995: nine were US and two were foreign cases. Four patients had spinal anesthesia, seven patients had epidural anesthesia. One spinal tap was traumatic; four of the epidural anesthesia had indwelling epidural catheter placed for continued analgesia. Nine of the eleven patients had undergone orthopedic surgery. All cases of epidural hematoma resulted in prolonged hospitalization with permanent and disabling neurological

sequelae for most patients. Delay in diagnosing the epidural hematoma contributed to the poor outcome of most patients. Of the nine cases of epidural hematomas in patients undergoing elective orthopedic surgery, 6 involved patients who had received enoxaparin not in adherence with the prescribing recommendations of the current labeling, namely, thromboprophylaxis with enoxaparin was either started preoperatively or less than 12 hours postoperatively, or NSAID were given concomitantly.

There had been no cases of epidural hematoma reported in any of the clinical trials with more than 9000 patients treated with enoxaparin or other LMWH. Although epidural or spinal anesthesia were frequently used, it is not known whether indwelling epidural catheters were used in any of the clinical trials.

The incidence rates of epidural or spinal hematomas as complications of regional or neuroaxial anesthesia from published reports are between 1:120,000 and 1:250,000, with most cases (60-80%) occurring in patients on anticoagulants or with impaired hemostasis. Additional risk factors include traumatic punctures, multiple attempts, anatomical characteristics and age. Epidural anesthesia, particularly when associated with insertion of epidural catheter, is more frequently associated with hemorrhagic complications than spinal anesthesia. However, the true incidence of epidural hematoma in anticoagulated patients receiving neuroaxial anesthesia is not known.

Based on the 1992 hospital discharge data and from independent survey of surgeons and anesthesiologists, it has been estimated that in US 370,000 of the 418,000 patients undergoing hip or knee replacement surgery received thromboprophylaxis. Approximately 225,000 patients had neuroaxial anesthesia, approximately 210,000 of them had thromboprophylaxis, and approximately 97,000 anticoagulated patients operated on with epidural anesthesia had epidural catheter placed for analgesia.

Measures to prevent the occurrence of this rare but serious complication include: strict adherence to prescription recommendations, atraumatic technique of epidural or spinal puncture, optimal timing of initiation of anesthesia and placement or removal of epidural catheters relative to the anticoagulant effect, awareness of the possibility of such complication with close monitoring of patients and prompt intervention as needed.

The total number of patients receiving thromboprophylaxis with enoxaparin was estimated at approximately 91,000 per year. Of these, approximately 26,000 and 23,000 per year had spinal anesthesia and epidural anesthesia respectively. Approximately 8,700 of the patients with epidural anesthesia had indwelling epidural catheter placed. Based on two year marketing of

enoxaparin, the overall frequency of epidural hematoma reported with the use of enoxaparin and neuroaxial anesthesia can be calculated at about 1:25,000 enoxaparin exposures per year with spinal anesthesia, about 1:6250 enoxaparin exposures per year with epidural anesthesia, and 1:3480 enoxaparin exposures per year with epidural indwelling catheters. The relative risk of epidural hematoma with enoxaparin compared to other methods of thromboprophylaxis or to other LMWHs is unknown. The labeling of Lovenox was revised to include the information concerning the risk of hemorrhage in patients with indwelling intrathecal or epidural catheters on 3-9-1995.

The sponsor has continued the post-marketing monitoring of complications of neuroaxial anesthesia and has undertaken focus group meeting with orthopedic surgeons and anesthesiologists regarding the current information in the package insert **WARNING** section. No new neuroaxial hemorrhages or other serious adverse events have been reported. However, the sponsor has submitted a new revision of the package insert in order to increase the visibility and add clarity to this safety information. The changes requested include:

1) Deletion of ",,,in patients with indwelling intrathecal or epidural catheter,..." from the **Hemorrhage** paragraph in the **WARNING** section, and addition of the following separate paragraph in the **WARNING** section:

Neuroaxial Anesthesia and Post-operative Indwelling Epidural Catheter Use: Spinal/Epidural anesthesia: As with other anticoagulants, there have been rare cases of neuroaxial hematomas reported with the concurrent use of enoxaparin and spinal/epidural anesthesia resulting in long-term or permanent paralysis. The risk of these rare events may be higher with the use of post-operative indwelling epidural catheters.

2) Addition of the following paragraph at the end of the **ADVERSE REACTIONS** section:

Ongoing Safety Surveillance: There have been rare reports of neuroaxial hematoma formation with concurrent use of enoxaparin and spinal/epidural anesthesia, and post-operative indwelling catheters. These events resulted in varying degrees of neurologic injuries including long-term or permanent paralysis.

Recommendations: The revised package insert for Lovenox Injection can be approved.

NDA 20-164

Page 4

Although rare, neuroaxial hemorrhage is a serious adverse event with disastrous consequences, therefore, the potential risk of such event should be adequately emphasized in the package insert.


Lilia Talarico, M.D.

cc:

NDA 20-164

HFD-180

HFD-180/SFredd

HFD-180/LTalarico

HFD-181/CSO

HFD-180/JChoudary

HFD-180/JGibbs

f/t 1/19/96 jgw

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1/19/96
Cancer
JP

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

NDA 20-164/S-005

ADMINISTRATIVE and CORRESPONDENCE
DOCUMENTS

34.1

DEC 27 1995

NDA 20-164/S-005

Rhone-Poulenc Rorer Pharmaceuticals
Attention: Mr. Ronald F. Panner
500 Arcola Road
Collegeville, PA 19426-0107

Dear Mr. Panner:

We acknowledge receipt of your supplemental application for the following:

Name of Drug Product: Lovenox (enoxaparin sodium) Injection

NDA Number: NDA 20-164

Supplement Number: S-005

Therapeutic Classification: Standard

Date of Supplement: December 19, 1995

Date of Receipt: December 21, 1995

This supplement, submitted as "Special Supplement - Changes Being Effected" under 21 CFR 314.70(c), provides for revisions to the WARNINGS and ADVERSE REACTIONS sections of the package insert regarding the potential for adverse events when epidural anesthesia and/or epidural catheters are used.

Unless we notify you within 60 days of our receipt date that the application is not sufficiently complete to permit a substantive review, this application will be filed under section 505(b) of the Act on February 19, 1996 in accordance with 21 CFR 314.101(a).

All communications concerning this supplemental application should be addressed as follows:

Center for Drug Evaluation and Research
Division of Gastrointestinal and Coagulation
Drug Products, HFD-180
Attention: DOCUMENT CONTROL ROOM, 6B-24
5600 Fishers Lane
Rockville, Maryland 20857

Should you have any questions, please contact me at
(301) 443-0487.

Sincerely yours,

Karen Oliver
Consumer Safety Officer
Division of Gastrointestinal
and Coagulation Drug
Products
Office of Drug Evaluation III
Center for Drug Evaluation and
Research

cc:

Original NDA 20-164/S-005
HFD-180/Div. Files
HF-2 (with labeling)
HFD-80
HFD-180/CSO/K.Oliver
DISTRICT OFFICE
HFD-735/D.Barash

drafted: KO/December 26, 1995 *K.Oliver 12/26/95*
Final: KO/12/26/95/c:\wpwin\karenfil\nda\20164512.0ko

SUPPLEMENT ACKNOWLEDGEMENT

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:
NDA 20-164/S-005

Name: Lovenox® (Enoxaparin Sodium) Injection

Sponsor: Rhone-Poulenc Rorer Pharmaceuticals

Approval Date: January 30, 1996

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 20-164/S-005

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Microbiology Review	
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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 20-164/S-005

APPROVAL LETTER

JAN 30 1996

NDA 20-164/S-005

Rhone-Poulenc Rorer Pharmaceuticals
Attention: Ronald F. Panner
500 Arcola Road
Collegeville, PA 19426-0107

Dear Mr. Panner:

Please refer to your December 19, 1995 supplemental new drug application submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Lovenox (enoxaparin sodium) Injection.

The supplemental application, submitted as "Special Supplement - Changes Being Effected" under 21 CFR 314.70(c), provides for revisions to the WARNINGS and ADVERSE REACTIONS sections of the package insert regarding the potential for adverse events when epidural anesthesia and/or epidural catheters are used.

We have completed the review of this supplemental application and have concluded that adequate information has been presented to demonstrate that the drug is safe and effective for use as recommended in the final printed labeling submitted on December 19, 1995. Accordingly, the supplemental application is approved effective on the date of this letter.

In addition, please submit three copies of the introductory promotional material that you propose to use for this product. All proposed materials should be submitted in draft or mock-up form, not final print. Please submit one copy to this Division and two copies of both the promotional material and the package insert directly to:

Food and Drug Administration
Division of Drug Marketing, Advertising and
Communications, HFD-240
5600 Fishers Lane
Rockville, Maryland 20857

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, please contact:

Karen Oliver
Consumer Safety Officer
(301) 443-0487

Sincerely yours,

Stephen B. Fredd, M.D.
Director
Division of Gastrointestinal and
Coagulation Drug Products
Office of Drug Evaluation III
Center for Drug Evaluation and
Research

cc:

Original NDA 20-164/S-005
HFD-180/Div. files
HFD-180/CSO/K.Oliver
HFD-180/S.Fredd
HFD-180/L.Talarico
HFD-103/P.Botstein (with labeling)
HFD-101/L.Carter
DISTRICT OFFICE
HF-2 (with labeling)
HFD-80 (with labeling)
HFD-40/DDMAC (with labeling)
HFD-613 (with labeling)
HFD-735/(with labeling) - for all NDAs and supplements for
adverse reaction changes.
HFD-560/D.Bowen (with labeling - for OTC Drug Products
Only)

drafted: KO/January 26, 1996

final: KO/01/26/96/c:\wpwin\karenfil\nda\20164601.2ko

APPROVAL

K. Oliver 01/26/96
SP 1/29/96

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
NDA 20-164/S-005

LABELING

Lovenox® (enoxaparin sodium) Injection

APPROVED

IN-1107H JAN 30 1996 Rev. 11/95

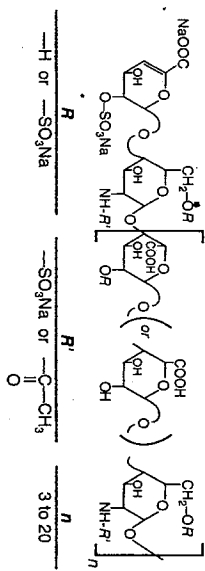
DESCRIPTION

Enoxaparin sodium is a sterile, low molecular weight heparin for injection. Each syringe contains 30 mg enoxaparin sodium (30 mg enoxaparin sodium) in 300 µL of water for injection. The pH of the injection is 5.5-7.5. The solution is preservative-free and intended for use only as a single-dose injection.

Enoxaparin is obtained by alkaline degradation of heparin benzyl ester derived from porcine intestinal mucosa. Its structure is characterized by a 2-O-sulfo-4-O-methyl-6-O-sulfate group at the non-reducing end and a 2-N,6-O-disulfo-D-glucosamine at the reducing end of the chain. The substance is the sodium salt. The average molecular weight is about 4500. The molecular weight distribution is:

<2000 caltons 5.20%
2000 to 8000 daltons 2.68%
>8000 daltons 5.15%

STRUCTURAL FORMULA



CLINICAL PHARMACOLOGY

End-point of anti-Factor Xa activity which has antithrombotic properties. In man enoxaparin is characterized by a higher ratio of anti-Factor Xa to anti-Factor IIa activity (3.35 ± 0.89) than unfractionated heparin (1.22 ± 0.31). Following the administration of a single subcutaneous dose of up to 90 mg of enoxaparin to healthy subjects, no appreciable change was observed in fibrinogen level and other parameters of fibrinolysis. At the recommended doses, single injections of enoxaparin do not significantly influence platelet aggregation or affect global clotting tests (i.e. prothrombin time [PT] or activated partial thromboplastin time [APTT]).

Pharmacodynamics

Maximum anti-Factor Xa and antithrombin (anti-Factor IIa) activities occur 3 to 5 hours after subcutaneous injection of enoxaparin. Mean peak anti-Factor Xa activity was 0.16 U/mL (1.58 µg/mL) and 0.35 U/mL (3.83 µg/mL) after the administration of 30 mg and 90 mg enoxaparin, respectively, in healthy volunteers. The volume of distribution of anti-Factor Xa activity is about 5 L. Following i.v. dosing, the total body clearance of enoxaparin is 25 mL/min. Elimination half-life based on anti-Factor Xa activity was about 1.5 hours after subcutaneous administration. Following a 40 mg dose significant anti-Factor Xa activity persists in plasma for about 12 hours. There appears to be no appreciable increase in anti-Factor Xa activity after dosing for 3 days in young healthy subjects. Clearance and C_{max} derived from anti-Factor Xa activity following single intravenous doses of 30 mg and 90 mg enoxaparin are similar in young and elderly subjects. The kinetics of anti-Factor Xa activity in anuric patients undergoing dialysis are similar to those in historical control normal subjects following i.v. dosing.

CLINICAL TRIALS

The decline of anti-Factor Xa activity with time was parallel to the decay curve of plasma total radioactivity (^{99m}Tc) in healthy volunteers. Following intravenous dosing of enoxaparin labeled with the gamma-emitter, ^{99m}Tc, 40% of radioactivity and 5-20% of anti-Factor Xa activity were recovered in urine in 24 hours.

Lovenox has been shown to prevent postoperative deep vein thrombosis (DVT) following hip or knee replacement surgery. In a double-blind study, Lovenox 30 mg q12h sc was compared to placebo in hip replacement patients. Treatment was initiated within 12-24 hours post-surgery and was continued for 10-14 days post-operatively.

Treatment Group	Treatment Group		
	Lovenox 30 mg q12h n (%)	Placebo n (%)	Lovenox 40 mg QD n (%)
All Treated Patients	50 (100%)	50 (100%)	23 (48%)
Treatment Failures	5 (10%)*	11 (22%)	9 (19%)*
Total DVT (%)	5 (10%)*	11 (22%)	9 (19%)*
Proximal DVT (%)	1 (2%)*	1 (2%)*	1 (2%)*
Distal DVT (%)	4 (8%)*	10 (20%)*	8 (17%)*
Proximal DVT (%)	1 (2%)*	1 (2%)*	1 (2%)*
Distal DVT (%)	4 (8%)*	10 (20%)*	8 (17%)*

*p value versus placebo = 0.0002
**p value versus placebo = 0.0034
A double-blind, multicenter study compared three dosing regimens of Lovenox in hip replacement patients. Treatment was initiated within two days post-surgery and was continued for 7-11 days post-operatively.

INDICATIONS AND USAGE

Lovenox Injection is indicated for prevention of deep vein thrombosis, which may lead to pulmonary embolism, following hip or knee replacement surgery.

CONTRAINDICATIONS

Lovenox Injection is contraindicated in patients with active major bleeding, in patients with thrombocytopenia associated with a positive *in vitro* test for anti-platelet antibody in the presence of enoxaparin sodium, or in patients with hypersensitivity to enoxaparin sodium.

WARNINGS

Lovenox Injection is not intended for intramuscular administration. Lovenox cannot be used interchangeably (unit for unit) with unfractionated heparin or other low molecular weight heparins as they differ in their manufacturing process, molecular weight distribution, anti-Xa and anti-IIa activities, units and dosage. Special attention and compliance with the instructions for use specific to each proprietary medicinal product are necessary.

Lovenox should be used with extreme caution in patients with a history of heparin-induced thrombocytopenia.

Hemorrhage. Lovenox Injection, like other anticoagulants, should be used with extreme caution in conditions with increased risk of hemorrhage, such as recent or active peptic ulcer disease, hemodialysis, recent or active bleeding, recent or active angiodysplastic gastrointestinal disease, hemorrhagic stroke, or shortly after brain, spinal or ophthalmological surgery, or in patients treated concomitantly with platelet inhibitors.

Bleeding can occur at any site during therapy with enoxaparin. An unexplained fall in hematocrit or blood pressure should lead to a search for a bleeding site.

Neuraxial Anesthesia and Post-operative Indwelling Epidural Catheter Use:

Spinal/epidural Anesthetics. As with other anticoagulants, there have been rare cases of neuraxial hematomas reported with the concurrent use of enoxaparin and spinal/epidural anesthesia resulting in long-term or permanent paralysis. The risk of these rare events may be higher with the use of post-operative indwelling epidural catheters.

Thrombocytopenia:

Thrombocytopenia can occur with the administration of LovenoX. Moderate thrombocytopenia (platelet counts between 100,000/mm³ and 50,000/mm³) occurred at a rate of 2.0% in patients given LovenoX, 2.0% in patients given heparin, and 1.7% in patients given placebo following hip or knee replacement surgery in clinical trials. Platelet counts less than 50,000/mm³ occurred at a rate of 0.1% in patients given LovenoX, 0.5% in patients given heparin, and 0% in patients given placebo in the hip surgery study. Platelet counts less than 50,000/mm³ occurred at a rate of 0.1% in patients given LovenoX, 0.5% in patients given heparin, and 0% in patients given placebo in the knee surgery study. Thrombocytopenia of any degree should be monitored closely. If the platelet count falls below 100,000/mm³, enoxaparin should be discontinued. The rate of incidence of this complication in usual medical practice is unknown at present. Practice. The rate of incidence of this complication in usual medical practice is unknown at present.

PRECAUTIONS

General: LovenoX Injection should not be mixed with other injections or infusions. LovenoX Injection should be used with care in patients with renal impairment, uncontrolled arterial hypertension or a history of recent gastrointestinal bleeding. Elderly patients and patients with renal insufficiency may show delayed elimination of enoxaparin. Enoxaparin should be used with care in these patients. LovenoX should be discontinued and appropriate if thromboembolic events occur despite enoxaparin prophylaxis. LovenoX should be discontinued and appropriate therapy initiated.

Laboratory Tests:

Periodic complete blood counts, including platelet count, and stool occult blood tests are recommended during the course of treatment with LovenoX Injection.

Drug Interactions:

It is recommended that agents which affect hemostasis be discontinued prior to LovenoX therapy as they may enhance the risk of hemorrhage. These agents include anti-coagulants such as: oral anticoagulants, and/or platelet inhibitors including acetylsalicylic acid, aspirin, NSAIDs (including ketorolac tromethamine), dipyridamol, or sulfipyrazole. Laboratory Tests, PRECAUTIONS).
Monitoring Level, Test Interactions:

Drug/Laboratory Test Interactions:

Elevations of Serum Aminotransferases: Elevations of serum aminotransferases (aspartate (AST [SGOT]) and alanine (ALT [SGPT]) aminotransferase levels greater than the upper limit of normal of the laboratory reference range have been reported in 10 normal subjects and in up to 4% of patients during treatment with LovenoX Injection. Significant increases in aminotransferase levels have also been observed in patients and animals treated with heparin and other low molecular weight heparins. Such elevations are usually reversible and are rarely associated with increases in bilirubin. Since weight heparins are important in the differential diagnosis of myocardial infarction, liver disease and aminotransferase elevations that might be caused by drugs like LovenoX should be interpreted with caution.
Pulmonary Effects, Impairment of Fertility:

No long-term studies in animals have been performed to evaluate carcinogenic potential of enoxaparin. Enoxaparin No long-term studies in *in vitro* tests, including the Ames test, mouse lymphoma cell (for mutagenesis test), and human lymphocyte chromosome aberration test and the *in vivo* rat bone marrow micronucleus test. Enoxaparin was found to have no effect on fertility or reproductive performance in male and female rats at subcutaneous doses up to 20 mg/kg/day or 141 mg/m²/day. The maximum received human dose in clinical trials was 1.5 mg/kg/day or 48.4 mg/m²/day.

Pregnancy, Teratogenic Effects:

Pregnancy category B: Teratology studies have been conducted in rats and rabbits at subcutaneous doses of enoxaparin up to 30 mg/kg/day or 48.4 mg/m²/day and 410 mg/m²/day, respectively. The maximum received human dose to clinical trials is 1.5 mg/kg/day or 48.4 mg/m²/day. There was no evidence of teratogenic effects or adverse animal reproduction. There are, however, no adequate and well-controlled studies in pregnant women. Use of enoxaparin during pregnancy are not always predictive of human response; this drug should be used during pregnancy only if clearly needed.

Non-teratogenic Effects

There have been a few spontaneous post-marketing reports of fetal death while using enoxaparin; none of the cases have been definitively associated with the use of the drug. In one case, placental hemorrhage and detachment were found in association with the fetal death. The placental hemorrhage should be considered a potential hazard to the fetus while taking this drug, the patient should be apprised of the potential hazard to the fetus.

Nursing Mothers:

It is not known whether this drug is excreted in human milk. Because many drugs are excreted in human milk, caution should be exercised when enoxaparin is administered to nursing women.
Pediatric Use: Safety and effectiveness of enoxaparin in children has not been established.

ADVERSE REACTIONS

Hemorrhage: The incidence of hemorrhagic complications during LovenoX Injection treatment has been low. The following rates of major bleeding events have been reported during clinical trials with LovenoX Injection and heparin and placebo in patients undergoing hip or knee replacement surgery.