**Practice Trends** 

# FDA, European Agencies Extend Cooperation Pact

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Contributing Writer

S. and European drug regulators have announced "intensified" information sharing and dialogue that aims to foster cooperation in drug approval and surveillance activity in the world's two largest pharmaceutical markets.

At a March meeting in Brussels, Food and Drug Administration, European Medicines Agency, and European Commission representatives judged as a success the implementation of a confidentiality agreement that has enabled greater transatlantic information sharing and dialogue on pharmaceutical regulations protecting 753 million people in 26 countries. The three agencies hope to particularly strengthen joint activities on vaccines in preparation for potential pandemic flu outbreaks, as well as cancer, children's, and orphan drugs, and pharmacogenomics. Future activities will address counterfeit medicines.

The original agreement, signed in September 2003, paved the way for quarterly exchanges on information on new drug applications, regulatory guidance, and inspections of manufacturing plants, which began in 2004. The pact also authorized ad hoc exchanges of information on drug safety and public health, including advance notice of significant regulatory actions such as pulling drugs from the market.

Such an exchange prevents other agencies from issuing contradictory advice when one agency takes significant regulatory action.

The ad hoc exchanges also have enabled "parallel" scientific guidance for drug applicants seeking the advice of the three agencies on how to proceed with research at such milestones as the conclusion of clinical trials. The first such parallel scientific meeting occurred in September 2003, and as part of the initial confidentiality arrangement a 1-year pilot project was initiated in 2005.

The focus of those parallel meetings is breakthrough drugs, those for rare conditions, medication for children, or other new medicines considered important.

The three agencies agreed to extend the pilot project, although the document released by the agencies did not say how long it would be extended.

### BRIEF SUMMARY OF PRESCRIBING INFORMATION

### Duac<sub>®</sub> Topical Gel (clindamycin, 1% - benzoyl peroxide, 5%)

For Dermatological Use Only. Not for Ophthalmic Use.

Rx Only

INDICATIONS AND USAGE
Duac Topical Gel is indicated for the topical treatment of inflammatory acnowlegaris.

Duac Topical Gel has not been demonstrated to have any additional benefit when compared to benzoyl peroxide alone in the same vehicle when used for the treatment of non-inflammatory acne.

Duac Topical Gel is contraindicated in those individuals who have shown hypersensitivity to any of its components or to lincomycin. It is also contraindicated in those having a history of regional enteritis, ulcerative colitis, pseudomembranous colitis, or antibiotic-associated colitis.

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ASSOCIATED WITH SEVERE COLITIS WHICH MAY RESULT IN PATIENT DEATH.
USE OF THE TOPICAL FORMULATION OF CLINDAMYCIN RESULTS IN
ABSORPTION OF THE ANTIBIOTIC FROM THE SKIN SURFACE. DIARRHEA, CLIDDAY CANDED TO JAMPATICA, AND CULITIS (INCLUDING PSEUDOMEMBRANOUS COLITIS) HAVE BEEN REPORTED WITH THE USE OF TOPICAL AND SYSTEMIC CLINDAMYCIN. STUDIES INDICATE A TOXIN(S) PRODUCED BY CLOSTRIDIA IS ONE PRIMARY CAUSE OF ANTIBIOTIC-ASSOCIATED COLITIS. THE COLITIS IS USUALLY CHARACTERIZED BY SEVERE PERSISTENT DIARRHEA AND SEVERE ABDOMINIAL CRAMPS AND MAY BE ASSOCIATED WITH THE PASSAGE OF BLOOD AND MUCUS. ENDOSCOPIC EXAMINATION MAY REVEAL PSEUDOMEMBRANOUS COLITIS. STOOL CULTURE FOR Clostridium difficile AND STOOL ASSAY FOR COLITIS. STOOL CULTURE FOR Clostridium difficile TOXIN MAY BE HELPFUL DIAGNOSTICALLY. WHEN SIGNIFICANT DIARRHEA OCCURS, THE DRUG SHOULD BE DISCONTINUED. LARGE BOWEL ENDOSCOPY SHOULD BE CONSIDERED TO ESTABLISH A LEFINITIVE DIAGNOSIS IN CASES OF SEVERE DIARRHEA. ANTIPERISTALTIC AGENTS SUCH AS OPIATES AND DIPHENOXYLATE WITH ATROPINE MAY PROLONG AND/OR WORSEN THE CONDITION. DIARRHEA, ANTIPERISTALTIC AGENTS SUCH AS OPIATES AND DIPHENOXYLATE WITH ATROPINE MAY PROLONG AND/OR WORSEN THE CONDITION. DIARRHEA, COLITIS AND PSEUDOMEMBRANOUS COLITIS HAVE BEEN OBSERVED TO BEGIN UP TO SEVERAL WEEKS FOLLOWING CESSATION OF ORAL AND PARENTERAL THERAPY WITH CLINDAMYCIN. BLOODY DIARRHEA, AND COLITIS (INCLUDING PSEUDOMEMBRANOUS COLITIS) Have been reported with the USE of Topical and Systemic

Mild cases of pseudomembranous colitis usually respond to drug discontinuation alone. In moderate to severe cases, consideration should be given to managemen with fluids and electrolytes, protein supplementation and treatment with an antibacterial drug clinically effective against *Clostridium difficile* colitis.

### PRECAUTIONS

FRECAUTIONS
General: For dermatological use only; not for ophthalmic use. Concomitant topical acne therapy should be used with caution because a possible cumulative irritancy effect may occur, especially with the use of peeling, desquamating, or abrasive

The use of antibiotic agents may be associated with the overgrowth of nonsusceptible organisms, including fungi. If this occurs, discontinue use of this medication and take appropriate measures.

Avoid contact with eyes and mucous membranes.

Clindamycin and erythromycin containing products should not be used in combination. *In vitro* studies have shown antagonism between these two antimicrobials. The clinical significance of this *in vitro* antagonism is not known.

Information for Patients: Patients using Duac Topical Gel should receive the following information and instructions:

- Duac Topical Gel is to be used as directed by the physician. It is for external use only. Avoid contact with eyes, and inside the nose, mouth, and all mucous membranes, as this product may be irritating.
- 2. This medication should not be used for any disorder other than that for which it
- Patients should not use any other topical acne preparation unless otherwise directed by their physician.
- 4. Patients should report any signs of local adverse reactions to their physician.
- 5. Duac Topical Gel may bleach hair or colored fabric.
- 6. Duac Topical Gel can be stored at room temperature up to 25°C (77°F) for up to 2 months. Do not freeze. Keep tube tightly closed. Keep out of the reach of small children. Discard any unused product after 2 months.
- Before applying Duac Topical Gel to affected areas, wash the skin gently, rinse with warm water, and pat dry.

Carcinogenesis, Mutagenesis, Impairment of Fertility: Benzoyl peroxide has been shown to be a tumor promoter and progression agent in a number of animal studies. The clinical significance of this is unknown.

Benzovl peroxide in acetone at doses of 5 and 10 mg administered twice per week 20 weeks of topical treatment.

Genotoxicity studies were not conducted with Duac Topical Gel. Clindamycin phosphate was not genotoxic in *Salmonella typhimurium* or in a rat micronucleus test. Benzoyl peroxide has been found to cause DNA strand breaks in a variety of test. Benzoyl peroxide has been found to cause DNA strand breaks in a variety of mammalian cell types, to be mutagenic in *Salmonella typhimurium* tests by some but not all investigators, and to cause sister chromatid exchanges in Chinese hamster ovary cells. Studies have not been performed with Duac Topical Gel or benzoyl peroxide to evaluate the effect on fertility. Fertility studies in rats treated orally with up to 300 mg/kg/day of clindamycin (approximately 120 times the amount of clindamycin in the highest recommended adult human dose of 2.5 g Duac Topical Gel, based on mg/m²) revealed no effects on fertility or mating ability.

Pregnancy: Teratogenic Effects: Pregnancy Category C: Animal reproduction studies have not been conducted with Duac Topical Gel or benzoyl peroxide. It is also not known whether Duac Topical Gel can cause fetal harm when administered to a pregnant woman or can affect reproduction capacity. Duac Topical Gel should be given to a pregnant woman only if clearly needed.

Developmental toxicity studies performed in rats and mice using oral doses of clindamycin up to 600 mg/kg/day (240 and 120 times the amount of clindamycin the highest recommended adult human dose based on mg/m², respectively) or subcutaneous doses of clindamycin up to 250 mg/kg/day (100 and 50 times the amount of clindamycin in the highest recommended adult human dose based on mg/m2, respectively) revealed no evidence of teratogenicity.

Nursing Women: It is not known whether Duac Topical Gel is secreted into human milk after topical application. However, orally and parenterally administered clindamycin has been reported to appear in breast milk. Because of the potential for serious adverse reactions in nursing infants, a decision should be made whether to discontinue nursing or to discontinue the drug, taking into account the importance of the drug to the property.

**Pediatric Use:** Safety and effectiveness of this product in pediatric patients below the age of 12 have not been established.

ADVERSE REACTIONS
During clinical trials, all patients were graded for facial erythema, peeling, burning, and dryness on the following scale: 0 = absent, 1 = mild, 2 = moderate, and 3 = severe. The percentage of patients that had symptoms present before treatment (at baseline) and during treatment were as follows:

Local reactions with use of Duac Topical Gel % of patients using Duac Topical Gel with symptom present Combined results from 5 studies (n = 397)							
	Before Treatment (Baseline)			During Treatment			
	Mild	Moderate	Severe	Mild	Moderate	Severe	
Erythema	28%	3%	0	26%	5%	0	
Peeling	6%	<1%	0	17%	2%	0	
Burning	3%	<1%	0	5%	<1%	0	
Dryness	6%	<1%	0	15%	1%	0	

(Percentages derived by # subjects with symptom score/# enrolled Duac subjects, n = 397).

Duac® (clindamycin, 1% - benzoyl peroxide, 5%) Topical Gel is available in a 45 gram tube - NDC 0145-2371-05.

**Prior to Dispensing:** Store in a cold place, preferably in a refrigerator, between  $2^{\circ}$ C and  $8^{\circ}$ C ( $36^{\circ}$ F and  $46^{\circ}$ F). Do not freeze.

**Dispensing Instructions for the Pharmacist:** Dispense Duac Topical Gel with a 60 day expiration date and specify "Store at room temperature up to  $25^{\circ}$ C ( $77^{\circ}$ F). Do not freeze."

Keep tube tightly closed. Keep out of the reach of small children.

U.S. Patent Nos. 5,466,446, 5,446,028, 5,767,098, and 6,013,637

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