Recent Withdrawals

- Seldane[™] (terfenadine)
- Posicor [™] (mibefradil)
- Duract ™ (bromphenac)
- Hismanal ™ (astemizole)
- Roxar ™ (grepafloxacin)
- Propulsid ™ (cisapride)
- Rezulin ™ (troglitazone)
- Lotronex ™ (alosetron HCI)
- Raplon [™] (rapcuronium)
- Baycol ™ (cerivaxtatin)
- Vioxx ™ (rofecoxib)

2/98 6/98 6/98 6/99 11/993/23/00 3/21/00 8/24/00 3/01 8/8/01 9/30/04

92 NME's from 1998-2000

Rezulin Withdrawal

"FDA took this action after its review of recent safety data...showed that Rezulin is more toxic to the liver than the other two drugs" [HHS News, 3/21/00]

"And we've had to withdraw drugs from the market that would have been safe if used according to label instructions" [Janet Woodcock, Temple University, 4/4/00]

Not to mention the "pain" in the pain reliever market

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Amount At Issue: No Amount Specified Date Added to Site: 9/19/2001					CONSUMER IDENTITY TH	
Commonly-Prescribed Antidepressants Are Extremely Dangerous for Some Some 200 legal actions have been filed against Eli Lilly, Pfizer, and GlaxoSmithKline, the manufacturers of Prozac (fluoxetine), Zoloft (sertraline), and Paxil (paroxetine), respectively, to recover for suicides or homicidessome completed, some only attemptedby patients in the first few days or weeks after they were prescribed one of these drugs.					MORTGAGE METABOLIFE NINTENDO PRESCRIPTIO	
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FDA RM Guidances

- Concept Papers, March 2003
- Hearings April 2003
- Draft Guidances, May 2004
- Final Guidances, March 2005
 - Premarketing Risk Assessment
 - Development and Use of Risk Minimization Action Plans (RiskMAPs)
 - Good Pharmacovigilance Practices and Pharmacoepidemiologic Assessment

Questions About the New Era

- What is the responsibility for a company when it comes to a new (or old) drug?
 - Labeling, PMS, how it is used, even if used incorrectly?
 - Risk "Perception" what is know to science, what is know to user, what is controllable?
- How "safe" must a drug be before it is marketed?
 - Safer than other drugs in the class?
 - How many (what size) studies must be done?