

Dragon, Karen E. (CDC/NIOSH/EID)

From: Cormack, Robert [rcormack@sucampo.com]
Sent: Tuesday, January 22, 2008 1:49 PM
To: NIOSH Docket Office (CDC)
Subject: Docket 105 - Comments
Attachments: spi-letter-niosh.pdf; publicreviewform2006-05-01-07.xls

Dear Sir or Madam:

Please see the attached letter and completed review form from Sucampo Pharmaceuticals regarding a formal request for delisting Amitiza (lubiprostone) from the draft NIOSH updated list of hazardous drugs.

Sincerely,

Robert S. Cormack, Ph.D., RAC
Director, Regulatory Affairs
Sucampo Pharmaceuticals, Inc.
4520 East-West Highway, 3rd Floor, Bethesda, MD 20814
Telephone: 240-223-3605

22 January 2008

National Institute for Occupational Safety and Health
Centers for Disease Control and Prevention

To whom it may concern:

It recently came to our attention that the National Institute for Occupational Safety and Health (NIOSH) has, in a draft document (NIOSH Docket 105), classified Amitiza (lubiprostone) as a hazardous drug based on the criteria of carcinogenicity.

Sucampo Pharmaceuticals recognizes the importance of identifying hazardous materials, including drugs, for the protection of those workers handling such substances. However, we would like to question the appropriateness and relevancy of classifying Amitiza as a hazardous drug and on what basis it was considered a carcinogen.

The Food and Drug Administration (FDA)-approved labeling text (package insert) for Amitiza states that in the 2-year, mouse carcinogenicity study there were no significant increase in any tumor incidences. In the corresponding long-term study in rat, there was a significant increase in the incidence of interstitial cell adenoma and hepatocellular adenoma in male and female rats, respectively. Although Amitiza exhibited signals of tumorigenicity in rat, the tumors that were observed were adenomas, which are, by definition, non-cancerous. Thus, both technically and clinically, Amitiza should not be characterized as a "carcinogenic" compound since only non-malignant or benign tumors were identified in the bioassays.

Thus based on the FDA's assessment of Amitiza's carcinogenic potential, as presented in the package insert, we respectfully request that NIOSH reconsider classifying the compound as hazardous as it does not meet the criteria for carcinogenicity.

If the decision of NIOSH to classify Amitiza as a hazardous drug (positive for carcinogenicity) is based on sources other than the FDA-approved package insert we would like to be informed of these materials as such information represents a potential safety concern for which Sucampo Pharmaceuticals is committed to investigate.

We look forward to receiving either a satisfactory response from NIOSH explaining the inclusion of Amitiza as a hazardous drug or an assurance from the institute to remove the agent from the listing.

Sincerely,



Robert S. Cormack, Ph.D., RAC
Director, Regulatory Affairs
Sucampo Pharmaceuticals, Inc.

Drugs to Review 2006 Docket #NIOHS-105
 Reviewer : Robert Cormack, Ph.D., Director of Regulatory Affairs
 Affiliation : Sucampo Pharmaceuticals, Inc.

<u>Proprietary Name</u>	<u>Established Name</u>	<u>Should this Drug be Included in the NIOSH Hazardous Drugs List ?</u>		<u>Comments</u>
		<u>yes</u>	<u>no</u>	
New FDA Drugs and Warnings Fitting NIOSH Criteria For Hazardous Drugs				
Abilify	aripiprazole			
Alimta	pemetrexed			
Amevive	alafacet			
Amitiza	lubiprostone		✓	The FDA-approved labeling text (package insert) for Amitiza (lubiprostone) states that in the 2-year, mouse carcinogenicity study there were no significant increase in any tumor incidences. In the corresponding long-term study in rat, there was a significant increase in the incidence of interstitial cell adenoma and hepatocellular adenoma in male and female rats, respectively. Although Amitiza exhibited signals of tumorigenicity in rat, the tumors that were observed were adenomas, which are, by definition, non-cancerous. Thus, both technically and clinically, Amitiza should not be characterized as a "carcinogenic" compound since only non-malignant or benign tumors were identified in the bioassays.
Apokyn	apomorphine HCl			
Arranon	nelarabine			
Avastin	bevacizumab			
Azilect	rasagiline mesylate			
Baraclude	entecavir			
Chantix	varenicline			
Clolar	clofarabine			
Cordarone	amidarone HCl			

Send reviews to: niocindocket@cdc.gov

Drugs to Review 2006 Docket #NIOSH-105
 Reviewer : Robert Cormack, Ph.D., Director of Regulatory Affairs
 Affiliation : Sucampo Pharmaceuticals, Inc.

Proprietary Name	Established Name	Should this Drug be Included in the NIOSH Hazardous Drugs List ?		Comments
		yes	no	
New FDA Drugs and Warnings Fitting NIOSH Criteria For Hazardous Drugs				
Dacogen	decitabine			
Depacone	valproate Na			
Depakene	valproic acid			
Depakote	divalproex Na			
Depo-Provera**	medroxyprogesterone acetate			
Elidel	pimecrolimus			
Eributx	cetuximab			
Geodon	ziprasidone			
Gleevec	imatinib mesylate			
Hivid	zalcitabine			
Hycamtin	topotecan HCl			
Increlex	mecasermin (rDNA origin)			
Kepivance	palifermin			
Leustatin	cladribine			
Lunesta	eszopiclone			
Lyrca	pregagalin			
Metastron	strontium-89 chloride			
Mycamine	miconazole sodium			
Myozyme	alglucosidase alfa			
Nexavar	sorafenib			
Orencia	abatacept			
Paxil	paroxetine HCl			

Send reviews to: niocindocket@cdc.gov

Drugs to Review 2006 Docket #NIOH-105

Reviewer : Robert Cormack, Ph.D., Director of Regulatory Affairs

Affiliation : Sucampo Pharmaceuticals, Inc.

<u>Proprietary Name</u>	<u>Established Name</u>	<u>Should this Drug be Included in the NIOSH Hazardous Drugs List ?</u>		<u>Comments</u>
		<u>yes</u>	<u>no</u>	
New FDA Drugs and Warnings Fitting NIOSH Criteria For Hazardous Drugs				
Pentetate Calcium				
Trisodium				
Photofrin	porfimer sodium			
Provera**	medroxyprogesterone acetate			
Quadramet	samarium 153 lexitronam			
Rapamune	sirolimus			
Revlimid	lenalidomide			
Risperdal Consta**	risperdone			
Risperdal**	risperidone			
Rituxan	rituximab			
Rozerem	ramelteon			
Seroquel	quetiapine fumerate			
Spiriva Handihaler	tiotropium bromide			
Sprycel	dasatinib			
Sustiva	efavirenz			
Sutent	sunitinib malate			
Tarceva	erlotinib HCl			
Tindamax	tinidazole			
Tracleer	bosentan			
Trileptal	oxcarbazepine			
Tygacil	tigecycline			
Tysabri	natalizumab			
Velcade	bortizomib			

Send reviews to: niocindocket@cdc.gov

Drugs to Review 2006 Docket #NIOSH-105

Reviewer : Robert Cormack, Ph.D., Director of Regulatory Affairs

Affiliation : Sucampo Pharmaceuticals, Inc.

<u>Proprietary Name</u>	<u>Established Name</u>	<u>Should this Drug be Included in the NIOSH Hazardous Drugs List ?</u>		<u>Comments</u>
		<u>yes</u>	<u>no</u>	
New FDA Drugs and Warnings Fitting NIOSH Criteria For Hazardous Drugs				
Vidaza	azacitidine			
Viramune	nevirapine			
Viread	tenofovir			
Vision Blue	trypan blue			
Zolinza	vorinostat			
Zonegran	zonisamide			
New FDA Drugs and Warnings Not Fitting NIOSH Criteria For Hazardous Drugs				
Actoplus Met	pioglitazone HCl/ metroformin HCl			
Actos	pioglitazone HCl			
Adderall	amphetamines			
Amphadase**	hyaluronidase			
Apidra	insulin glulisine			
Aptivus	tipranivir			
Aranesp	darbepoetin alfa			
Avandaryl	rosiglitazone maleate/ glimepiride			
Avonex	interferon beta 1a			
Betaseron	interferon beta 1b			
Byetta	exenatide			
Campral	acamprosate calcium			
Candidis	casopfungin acetate			

Send reviews to: niocindocket@cdc.gov

Drugs to Review 2006 Docket #NIOSH-105
 Reviewer : Robert Cormack, Ph.D., Director of Regulatory Affairs
 Affiliation : Sucampo Pharmaceuticals, Inc.

<u>Proprietary Name</u>	<u>Established Name</u>	<u>Should this Drug be Included in the NIOSH Hazardous Drugs List ?</u>	<u>Comments</u>
		<u>yes</u> <u>no</u>	
New FDA Drugs and Warnings Fitting NIOSH Criteria For Hazardous Drugs			
ChiRhoStim	human secretion		
Clozaril	clozapine		
Concerta*	methylphenidate HCl		
Cymbalta	duloxetine HCl		
Daytrana*	methylphenidate HCl		
Dexedrine	dextroamphetamine		
Dilaudid	hydromorphone HCl		
Diovan	valsartan		
Eliprase	idursulfate		
Elimiron	pentosan polysulfate Na		
Enablex	darifenacin HBr		
Epogen**	epoetin alfa		
Eraxis	andulafungin		
Ethylol	amifostine		
Exjade	deferasirox		
Focalin	dexmethylphenidate HCl		
Fortovase**	saquinavir mesylate		
Fosrenol	lanthanum carbonate hydrate		
Gabitril	tiagabine		
Herceptin	trastuzumab		
Humira	adalimumab		
Hydase**	hyaluronidase		
Invirase**	saquinavir mesylate		

Send reviews to: niocindocket@cdc.gov

Drugs to Review 2006 Docket #NIOOSH-105
 Reviewer : Robert Cormack, Ph.D., Director of Regulatory Affairs
 Affiliation : Sucampo Pharmaceuticals, Inc.

<u>Proprietary Name</u>	<u>Established Name</u>	<u>Should this Drug be Included in the NIOSH Hazardous Drugs List ?</u>		<u>Comments</u>
		<u>yes</u>	<u>no</u>	

New FDA Drugs and Warnings Fitting NIOSH Criteria For Hazardous Drugs

Iplex	mecasermin rinfabate			
Januvia	sitagliptin phosphate			
Ketek	telithromycin			
Lamictal	lamotrigine			
Levemir	insulin detemir			
Lucentis	ranibizumab			
Lumigan	bimatoprost			
Macugen	pegaptanib sodium			
Magnevist	gadopentetate dimeglumine			
Metadate*	methylphenidate HCl			
Methylin*	methylphenidate HCl			
Multihance	gadobenate dimeglumine			
Naglazyme	galsulfase			
Nevanac	nepafenac			
Nexium	esomeprazole magnesium			
Noxafil	posaconazole			
NutreStore	L-glutamine			
Omacor	omega-3-acid ethylesters			
Opana	oxycodone HCl			
Pentetate Zinc				
Trisodium				
Prevacid NapralPAC	lansoprazole; naproxen			
Prezista	darunavir			

Drugs to Review 2006 Docket #NIOH-105

Reviewer : Robert Cormack, Ph.D., Director of Regulatory Affairs

Affiliation : Sucampo Pharmaceuticals, Inc.

Send reviews to: niocindocket@cdc.gov

Proprietary Name	Established Name	Should this Drug be Included in the NIOSH Hazardous Drugs List ?		Comments
		yes	no	
New FDA Drugs and Warnings Fitting NIOSH Criteria For Hazardous Drugs				
Prialt	ziconotide			
Procrit**	epoetin alfa			
Propranolol HCl				
Ranexa	ranolazine			
Raptiva	efalizumab			
Remicade	infliximab			
Ritalin*	methylphenidate HCl			
Sanctura	trospium chloride			
Sensipar	cinacalcet HCl			
Serzone	nefazodone HCl			
Strattera	atomoxetine HCl			
Symlin	pramlintide acetate			
Trasylol	aprotinin			
Tyzeka	telbivudine			
Vectibix	panitumumab			
Ventavis	iloprost			
Veregen	kunecatechins			
VESIcare	solifenacin succinate			
Videx	didanosine			
Visudyne	verteporfin			
Vitrase	ovine hyaluronidase			
Wellbutrin**	bupropion HCl			
Xifaxan	rifaximin			

Drugs to Review 2006 Docket #NIOHS-105

Reviewer : Robert Cormack, Ph.D., Director of Regulatory Affairs

Affiliation : Sucampo Pharmaceuticals, Inc.

Send reviews to: niocindocket@cdc.gov

<u>Proprietary Name</u>	<u>Established Name</u>	<u>Should this Drug be Included in the NIOSH Hazardous Drugs List ?</u>	<u>Comments</u>
		yes no	
New FDA Drugs and Warnings Fitting NIOSH Criteria For Hazardous Drugs			
Zarontin	ethosuximide		
Zinecard	dextrazoxane		
Zyban**	bupropion HCl		
Zyprexa	olanzapine		

* = several proprietary names for same drug; ** = two proprietary names for same drug

ADDITIONAL COMMENTS