On January 9, 1973, Regulatory Letters were issued to firms believed to be manufacturers, repackers, or distributors of parenteral drug products for human use containing adrenal cortex extract or adrenal cortex injection. The letter requested the firms' intentions regarding discontinuance of marketing and removal of outstanding stocks from trade channels down to the retail level.

For numerous years parenteral drugs containing adrenal cortex extract or adrenal cortex injection have been marketed with labeled indications for human use in the treatment of various conditions including adrenal cortical insufficiency, burns, trauma, and hypoglycemia. There is, however, a lack of substantial evidence of these drugs' safety and effectiveness for these labeled indications.

Adrenal cortex extract and adrenal cortex injection have a low cortico-steroid potency which presents a substantial risk of undertreatment and thereby a hazard to the patients. It should be noted that in the AMA Drug Evaluations, 1971 First Edition, the adrenal cortex injection (adrenal cortex extract) is considered "an obsolete preparation for treatment of adrenal cortical insufficiency." The AMA Drug Evaluations, 1973 Second Edition considers that "there is no known medical use for this drug." Our medical advisers concur that these drug products are not generally recognized as safe and effective for labeled indications for human use.

In view of these facts, parenteral drugs for human use containing adrenal cortex extract or adrenal cortex injection are considered as new drugs for which there have been no New Drug Applications approved. The FDA considers these preparations to be new drugs within the meaning of Section 201(p) and their marketing without an approved New Drug Application is regarded as a violation of Section 505 of the Federal Food, Drug, and Cosmetic Act.
Although there may be drugs containing adrenal cortex extract or adrenal cortex injection which were marketed before 1938, it is the responsibility of the manufacturer/distributor to provide evidence that their specific drug enjoys the status of a "grandfathered" drug by demonstrating that there are sufficient data or information to justify such status. (See also Title 21 CFR Part 310.100.)

Attached are copies of the letters issued to firms in your District, and an information copy of the form letter to those Districts with no applicable firms. The Division of Drug Labeling Compliance will monitor the firms' replies, furnish the District with copies of such replies, and issue assignments where indicated. Although this is not a DESI drug, the same procedures for follow-up will be utilized.

Please submit labeling and FD-3033's for any additional parenteral drug products for human use containing adrenal cortex extract or adrenal cortex injection so that we may institute follow-up where indicated.

Albert Lavender, Chief
Prescription Drug Compliance Branch

PRIORIT Y : HIGH
PAC CODE : 520001
PROJECT CODE : 52
ESTIMATED TIME : TWO HOURS
PROJECT OFFICER : DOROTHY L. OLSON, Telephone: 8-443-4206
CERTIFIED

PRODUCT:

Gentlemen:

This letter is in reference to the drug product listed above which you market containing adrenal cortex extract or adrenal cortex injection alone or in combination with other ingredients.

The Food and Drug Administration has reviewed available data concerning the use of adrenal cortex extract and injection in various conditions such as adrenal cortical insufficiency, shock, burns, and hypoglycemia, and concluded that the low level of corticosteroid contained in these drugs presents a substantial risk that these serious conditions will be undertreated. These drugs therefore pose a significant potential hazard to patients. We note that such drugs are described in the AMA Drug Evaluations 1971 First Edition and 1973 Second Edition as obsolete and of no known medical use.

In view of the above, and in the absence of substantial scientific evidence which demonstrates that a drug containing adrenal cortex extract or adrenal cortex injection is generally recognized as safe and effective, we consider your product to be a new drug that is in violation of the Federal Food, Drug, and Cosmetic Act as follows:

SECTION 505(a)

VIOLATION

The article is a new drug which may not be introduced or delivered for introduction into interstate commerce, under Section 505(a) of the Federal Food, Drug, and Cosmetic Act, since it is a new drug within the meaning of Section 201(p) of the Act and no approval of application filed pursuant to Section 505(b) is effective for such drug, and no notice of claimed investigational exemption under Section 505(j) and regulation 312.1 is on file for such drug.
We request that you reply within ten (10) days of the receipt of this letter stating the action you will take to discontinue the marketing of your product listed above, and any identical or similar products containing adrenal cortex extract or injection which you may market. If such corrective action is not promptly undertaken, the Food and Drug Administration is prepared to initiate legal action to enforce the law. The Federal Food, Drug, and Cosmetic Act provides for seizure of illegal products and/or injunction against the manufacturer and/or distributor of illegal products, 21 U.S.C. 332 and 334.

We request that your reply include (1) an estimate of the quantity of the drug manufactured within the past 12 months; (2) an estimate of the size and frequency of shipments made by you within the past 12 months; (3) an estimate of the amount of the drug listed above that is in inventory under your control and that which remains in channels of distribution outside of your control; (4) in the event that you have already discontinued marketing this drug product, the date of discontinuance; and (5) your intentions with respect to the disposition of your inventory and the withdrawal of outstanding stocks from trade channels down to the retail level. Your reply should be directed to Dorothy L. Olson, Project Officer I Prescription Drug Compliance Branch (HFD-313), Division of Drug Labeling Compliance, Bureau of Drugs, Food and Drug Administration, 5600 Fishers Lane, Rockville, Maryland, 20857.

Sincerely yours,

T. E. Byers
Associate Director for Compliance
Bureau of Drugs