

FDA Approved Labeling for NDA 020427 dated 8/21/09

Page 1

HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use SABRIL safely and effectively. See full prescribing information for SABRIL.

Sabril® (vigabatrin) Tablets
For Oral Administration Only
Initial U.S. Approval: 2009



WARNING: VISION LOSS
See full prescribing information for complete boxed warning

- SABRIL causes progressive and permanent bilateral concentric visual field constriction in a high percentage of patients. In some cases, SABRIL may also reduce visual acuity.
- Risk increases with total dose and duration of use, but no exposure to SABRIL is known that is free of risk of vision loss
- Risk of new and worsening vision loss continues as long as SABRIL is used, and possibly after discontinuing SABRIL
- Periodic vision testing is required for patients on SABRIL, but cannot reliably prevent vision damage
- Because of the risk of permanent vision loss, SABRIL is available only through a special restricted distribution program

INDICATIONS AND USAGE

SABRIL is an antiepileptic drug (AED) indicated for:

- **Refractory Complex Partial Seizures in Adults** (1.1). It should be used as adjunctive therapy in patients who have responded inadequately to several alternative treatments.

DOSAGE AND ADMINISTRATION

- **Refractory Complex Partial Seizures in Adults:** Initiate therapy at 500 mg twice daily, increasing total daily dose per instructions. The recommended dose is 1.5 grams twice daily (2.1).
- Dose adjustment recommended in renally impaired patients (2.2)
- Reduce dose gradually upon discontinuation (2.3)

DOSAGE FORM AND STRENGTHS

Tablet: 500 mg (3.1)

CONTRAINDICATIONS

None (4)

WARNINGS AND PRECAUTIONS

- SABRIL causes permanent vision loss (5.1)
- Abnormal MRI signal changes have been reported in some infants with IS receiving SABRIL (5.3)
- Antiepileptic drugs, including SABRIL, increase the risk of suicidal thoughts and behavior (5.5)
- Dose should be tapered gradually to avoid withdrawal seizures (5.6)
- SABRIL causes anemia (5.7)
- SABRIL causes somnolence and fatigue (5.8)
- SABRIL causes peripheral neuropathy (5.9)
- SABRIL causes weight gain (5.10)
- SABRIL causes edema (5.11)

ADVERSE REACTIONS

Most common adverse reactions (change of $\geq 5\%$ over placebo) in addition to permanent vision loss in adult controlled trials with vigabatrin were fatigue, somnolence, nystagmus, tremor, vision blurred, memory impairment, weight gain, arthralgia, abnormal coordination, and confusional state (6.1)

To report SUSPECTED ADVERSE REACTIONS, contact Lundbeck Inc. at 1-800-455-1141 or www.lundbeckinc.com or FDA at 1-800-FDA-1088 or www.fda.gov/medwatch.

DRUG INTERACTIONS

- Decreased phenytoin plasma levels have been reported (7.1)

USE IN SPECIFIC POPULATIONS

- **Pregnancy:** Based on animal data, may cause fetal harm. Pregnancy registry available (8.1)
- **Nursing Mothers:** SABRIL is excreted in human milk (8.2)
- **Renal Impairment:** Dose adjustment recommended (2.2, 8.4, 8.5)

See 17 for PATIENT COUNSELING INFORMATION and FDA-approved patient labeling (Medication Guide).

Issued: 08/2009

FDA Approved Labeling for NDA 020427 dated 8/21/09

Page 2

1	FULL PRESCRIBING INFORMATION: CONTENTS
2	WARNING: VISION LOSS
3	1 INDICATIONS AND USAGE
4	1.1 Refractory Complex Partial Seizures in Adults
5	2 DOSAGE AND ADMINISTRATION
6	2.1 Refractory Complex Partial Seizures in Adults
7	2.2 Patients with Renal Impairment
8	2.3 General Dosing Considerations
9	3 DOSAGE FORMS AND STRENGTHS
10	3.1 Tablet
11	4 CONTRAINDICATIONS
12	5 WARNINGS AND PRECAUTIONS
13	5.1 Vision Loss (see BOXED WARNING)
14	5.2 Distribution Program for SABRIL
15	5.3 Magnetic Resonance Imaging (MRI) Abnormalities
16	5.4 Neurotoxicity
17	5.5 Suicidal Behavior and Ideation
18	5.6 Withdrawal of Antiepileptic Drugs (AEDs)
19	5.7 Anemia
20	5.8 Somnolence and Fatigue
21	5.9 Peripheral Neuropathy
22	5.10 Weight Gain
23	5.11 Edema
24	6 ADVERSE REACTIONS
25	6.1 Adverse Reactions in Clinical Trials
26	6.2 Post Marketing Experience
27	7 DRUG INTERACTIONS
28	7.1 Phenytoin
29	7.2 Other AEDs
30	7.3 Clonazepam
31	7.4 Oral Contraceptives
32	7.5 Drug-Laboratory Test Interactions
33	8 USE IN SPECIFIC POPULATIONS
34	8.1 Pregnancy
35	8.2 Nursing Mothers
36	8.3 Pediatric Use
37	8.4 Geriatric Use
38	8.5 Renal Impairment
39	9 DRUG ABUSE AND DEPENDENCE
40	9.1 Controlled Substance Class
41	9.2 Abuse
42	9.3 Dependence
43	10 OVERDOSAGE
44	10.1 Signs, Symptoms, and Laboratory Findings of Overdosage
45	10.2 Treatment or Management for Overdosage
46	11 DESCRIPTION
47	12 CLINICAL PHARMACOLOGY
48	12.1 Mechanism of Action
49	12.2 Pharmacodynamics
50	12.3 Pharmacokinetics
51	13 NONCLINICAL TOXICOLOGY
52	13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility
53	14 CLINICAL STUDIES
54	14.1 Complex Partial Seizures in Adults
55	15 REFERENCES
56	16 HOW SUPPLIED/STORAGE AND HANDLING

FDA Approved Labeling for NDA 020427 dated 8/21/09
Page 3

57		16.1	SABRIL Tablet
58	17		PATIENT COUNSELING INFORMATION
59		17.1	Vision Loss
60		17.2	Suicidal Thinking and Behavior
61		17.3	Use in Pregnancy
62		17.4	Withdrawal of SABRIL Therapy
63		17.5	FDA-Approved Medication Guide

WARNING: VISION LOSS

- SABRIL causes permanent bilateral concentric visual field constriction in 30 percent or more of patients that ranges in severity from mild to severe, including tunnel vision to within 10 degrees of visual fixation, and can result in disability. In some cases, SABRIL also can damage the central retina and may decrease visual acuity.
- The onset of vision loss from SABRIL is unpredictable, and can occur within weeks of starting treatment or sooner, or at any time during treatment, even after months or years
- The risk of vision loss increases with increasing dose and cumulative exposure, but there is no dose or exposure known to be free of risk of vision loss
- Vision testing at baseline (no later than 4 weeks after starting SABRIL) and at least every 3 months during therapy is required for adults on SABRIL. Vision testing is also required about 3 to 6 months after the discontinuation of SABRIL therapy. Once detected, vision loss due to SABRIL is not reversible. It is expected that, even with frequent monitoring, some patients will develop severe vision loss.
- It is possible that vision loss can worsen despite discontinuation of SABRIL
- Because of the risk of vision loss, SABRIL should be withdrawn from patients who fail to show substantial clinical benefit within 3 months of initiation, or sooner if treatment failure becomes obvious. Patient response to and continued need for SABRIL should be periodically reassessed.
- Symptoms of vision loss from SABRIL are unlikely to be recognized by patients or caregivers before vision loss is severe. Vision loss of milder severity, while often unrecognized by the patient, can still adversely affect function.
- SABRIL should not be used in patients with, or at high risk of, other types of irreversible vision loss unless the benefits of treatment clearly outweigh the risks. The interaction of other types of irreversible vision damage with vision damage from SABRIL has not been well-characterized, but is likely adverse.
- SABRIL should not be used with other drugs associated with serious adverse ophthalmic effects such as retinopathy or glaucoma unless the benefits clearly outweigh the risks
- The lowest dose and shortest exposure to SABRIL should be used that is consistent with clinical objectives

Because of the risk of permanent vision loss, SABRIL is available only through a special restricted distribution program called SHARE, by calling 1-888-45-SHARE. Only prescribers and pharmacies registered with SHARE may prescribe and distribute SABRIL. In addition, SABRIL may be dispensed only to patients who are enrolled in and meet all conditions of SHARE [see WARNINGS AND PRECAUTIONS, Distribution Program for SABRIL (5.2)].

64

65 **1 INDICATIONS AND USAGE**

66

67 **1.1 Refractory Complex Partial Seizures in Adults**

68 SABRIL[®] is indicated as adjunctive therapy for adult patients with refractory
69 complex partial seizures (CPS) who have inadequately responded to several
70 alternative treatments and for whom the potential benefits outweigh the risk of

FDA Approved Labeling for NDA 020427 dated 8/21/09
Page 5

71 vision loss [see WARNINGS AND PRECAUTIONS, Vision Loss (5.1)]. SABRIL is
72 not indicated as a first line agent for complex partial seizures.

73

74 **2 DOSAGE AND ADMINISTRATION**

75

76 **2.1 Refractory Complex Partial Seizures in Adults**

77 SABRIL 500 mg tablets should be given as twice daily oral administration with or
78 without food. Therapy should be initiated at 1 g/day (500 mg twice daily). Total
79 daily dose may be increased in 500 mg increments at weekly intervals depending
80 on response. The recommended dose of SABRIL in adults is 3 g/day (1.5 g
81 twice daily). A 6 g/day dose has not been shown to confer additional benefit
82 compared to the 3 g/day dose and is associated with an increased incidence of
83 adverse events.

84

85 **2.2 Patients with Renal Impairment**

86 SABRIL is primarily eliminated through the kidney. In patients with renal
87 impairment, dose adjustments should be made as follows:

88

89 In patients with mild renal impairment (CLcr >50 to 80 mL/min), the dose should
90 be decreased by 25%; in patients with moderate renal impairment (CLcr >30 to
91 50 mL/min), the dose should be decreased by 50%; and in patients with severe
92 renal impairment (CLcr >10 to <30 mL/min), the dose should be decreased by
93 75%.

94

95 CLcr in mL/min may be estimated from a serum creatinine (mg/dL) determination
96 using the following formula:

97

98 $CLcr^* = [140 - \text{age (years)}] \times \text{weight (kg)} / 72 \times \text{serum creatinine (mg/dL)}$

99 $*[\times 0.85 \text{ for female patients}]$

100

101 The effect of dialysis on SABRIL clearance has not been adequately studied.

102

103 [see CLINICAL PHARMACOLOGY, Pharmacokinetics, Renal Impairment (12.3)
104 and USE IN SPECIFIC POPULATIONS, Renal Impairment (8.5)].

105

106 **2.3 General Dosing Considerations**

107 SABRIL should be withdrawn gradually. In controlled clinical studies in adults
108 with CPS, vigabatrin was tapered by decreasing the daily dose 1 g/day on a
109 weekly basis until discontinued [see WARNINGS AND PRECAUTIONS,
110 Withdrawal of Antiepileptic Drugs (AEDs) (5.6)].

111

112 **3 DOSAGE FORMS AND STRENGTHS**

113

114 **3.1 Tablet**

115 500 mg Tablet.

116

FDA Approved Labeling for NDA 020427 dated 8/21/09
Page 6

117 **4 CONTRAINDICATIONS**

118 None.

119

120 **5 WARNINGS AND PRECAUTIONS**

121

122 **5.1 Vision Loss (see BOXED WARNING)**

123

124 **Because of the risk of vision loss and because SABRIL, when it is effective,**
125 **provides an observable symptomatic benefit, a patient who fails to show**
126 **substantial clinical benefit within 3 months of initiation of treatment, should**
127 **be withdrawn from SABRIL. If in the clinical judgment of the prescriber**
128 **evidence of treatment failure becomes obvious earlier than 3 months,**
129 **treatment with SABRIL should be discontinued at that time. Patient**
130 **response to and continued need for treatment should be periodically**
131 **assessed.**

132 ***Monitoring of Vision***

133

134 Monitoring of vision by an ophthalmic professional with expertise in visual field
135 interpretation and the ability to perform dilated indirect ophthalmoscopy of the
136 retina is required. Vision testing at baseline (no later than 4 weeks after starting
137 SABRIL) and at least every 3 months is required for adults on SABRIL. Vision
138 testing is also required about 3 to 6 months after the discontinuation of SABRIL
139 therapy.

140

141 The diagnostic approach should be individualized for the patient and clinical
142 situation, but for all patients attempts to monitor vision periodically must be
143 documented under the SHARE program. Perimetry is recommended, preferably
144 by automated threshold visual field testing. Additional testing may also include
145 electrophysiology (e.g., electroretinography [ERG]), retinal imaging (e.g., optical
146 coherence tomography [OCT]), and/or other methods appropriate for the patient.
147 In patients in whom vision testing is not possible, treatment may continue
148 according to clinical judgment, with appropriate patient counseling and with
149 documentation in the SHARE program of the inability to test vision. Because of
150 variability, results from ophthalmic monitoring must be interpreted with caution,
151 and repeat testing is recommended if results are abnormal or uninterpretable.
152 Repeat testing in the first few weeks of treatment is recommended to establish if,
153 and to what degree, reproducible results can be obtained, and to guide selection
154 of appropriate ongoing monitoring for the patient.

155

156 The onset and progression of vision loss from SABRIL is unpredictable, and it
157 may occur or worsen precipitously between tests. Once detected, vision loss
158 due to SABRIL is not reversible. It is expected that even with frequent monitoring,
159 some SABRIL patients will develop severe vision loss.

160

161 **5.2 Distribution Program for SABRIL**

FDA Approved Labeling for NDA 020427 dated 8/21/09
Page 7

162 SABRIL is available only under a special restricted distribution program called
163 the SHARE program. Under the SHARE program, only prescribers and
164 pharmacies registered with the program are able to prescribe and distribute
165 SABRIL. In addition, SABRIL may be dispensed only to patients who are enrolled
166 in and meet all conditions of SHARE. Contact the SHARE program at 1-888-45-
167 SHARE.

168

169 To enroll in SHARE, prescribers must understand the risks of SABRIL and
170 complete the SHARE Prescriber Enrollment and Agreement Form indicating
171 agreement to:

172

- 173 • Enroll all patients in SHARE
- 174 • Review the SABRIL Medication Guide with every patient
- 175 • Educate patients on the risks of SABRIL, including the risk of vision loss
176 [see BOXED WARNING: VISION LOSS]
- 177 • Order and review vision assessments at initiation of SABRIL treatment
178 and every 3 months during therapy
- 179 • Remove patients from SABRIL therapy if the patients do not experience
180 meaningful reduction in seizures
- 181 • Counsel patients who fail to comply with the program requirements
- 182 • Remove patients from SABRIL therapy who fail to comply with the
183 program requirements after appropriate counseling

184

185 **5.3 Magnetic Resonance Imaging (MRI) Abnormalities**

186 Abnormal MRI signal changes characterized by increased T2 signal and
187 restricted diffusion in a symmetric pattern involving the thalamus, basal ganglia,
188 brain stem, and cerebellum have been observed in some infants treated for
189 Infantile Spasms (IS) with vigabatrin. In a retrospective epidemiologic study in
190 infants with IS (N=205), the prevalence of these changes was 21.5% in
191 vigabatrin-treated patients versus 4.1% in patients treated with other therapies.

192

193 In the study above, in post marketing experience, and in published literature
194 reports, these changes generally resolved with discontinuation of treatment. In a
195 few patients, the lesion resolved despite continued use. It has been reported that
196 some infants exhibited coincident motor abnormalities, but no causal relationship
197 has been established and the potential for long-term clinical sequelae has not
198 been adequately studied.

199

200 Neurotoxicity (including convulsions and hypomyelination) was observed in rats
201 exposed to vigabatrin during late gestation and the neonatal and juvenile periods
202 of development. The relationship between these findings and the abnormal MRI
203 findings in infants treated for IS with vigabatrin is unknown [see WARNINGS
204 AND PRECAUTIONS, Neurotoxicity (5.4) and USE IN SPECIFIC
205 POPULATIONS, Pregnancy (8.1)].

206

207 The specific pattern of signal changes observed in IS patients was not observed
208 in older children and adult patients treated with vigabatrin for CPS. In a blinded
209 review of MRI images obtained in prospective clinical trials in patients with CPS 3
210 years and older (N=656), no difference was observed in anatomic distribution or
211 prevalence of MRI signal changes between vigabatrin treated and placebo
212 patients.

213

214 For adults treated with SABRIL, routine MRI surveillance is unnecessary as there
215 is no evidence that vigabatrin causes MRI changes in this population.

216

217 **5.4 Neurotoxicity**

218 Vacuolization, characterized by fluid accumulation and separation of the outer
219 layers of myelin, has been observed in brain white matter tracts in adult and
220 juvenile rats and adult mice, dogs, and possibly monkeys following administration
221 of vigabatrin. This lesion, referred to as intramyelinic edema (IME), was seen in
222 animals at doses within the human therapeutic range. A no-effect dose was not
223 established in rodents or dogs. In the rat and dog, vacuolization was reversible
224 following discontinuation of vigabatrin treatment, but, in the rat, pathologic
225 changes consisting of swollen or degenerating axons, mineralization, and gliosis
226 were seen in brain areas in which vacuolation had been previously observed.
227 Vacuolization in adult animals was correlated with alterations in MRI and
228 changes in visual and somatosensory evoked potentials (EP).

229

230 Administration of vigabatrin to rats during the neonatal and juvenile periods of
231 development produced vacuolar changes in the gray matter (areas including the
232 thalamus, midbrain, deep cerebellar nuclei, substantia nigra, hippocampus, and
233 forebrain) which are considered distinct from the IME observed in vigabatrin
234 treated adult animals. Decreased myelination, retinal dysplasia, and
235 neurobehavioral abnormalities (convulsions, neuromotor impairment, learning
236 deficits) were also observed following vigabatrin treatment of young rats. These
237 effects occurred at doses associated with plasma vigabatrin levels substantially
238 lower than those achieved clinically in infants and children.

239

240 In a published study, vigabatrin (200, 400 mg/kg/day) induced apoptotic
241 neurodegeneration in the brain of young rats when administered by
242 intraperitoneal injection on postnatal days 5-7.

243

244 Administration of vigabatrin to female rats during pregnancy and lactation at
245 doses below those used clinically resulted in hippocampal vacuolation and
246 convulsions in the mature offspring.

247

248 Abnormal MRI signal changes characterized by increased T2 signal and
249 restricted diffusion in a symmetric pattern involving the thalamus, basal ganglia,
250 brain stem, and cerebellum have been observed in some infants treated for IS
251 with vigabatrin. Studies of the effects of vigabatrin on MRI and EP in adult

252 epilepsy patients have demonstrated no clear-cut abnormalities [see WARNINGS
253 AND PRECAUTIONS, MRI Abnormalities (5.3)].

254 **5.5 Suicidal Behavior and Ideation**

255 Antiepileptic drugs (AEDs), including SABRIL, increase the risk of suicidal
256 thoughts or behavior in patients taking these drugs for any indication. Patients
257 treated with any AED for any indication should be monitored for the emergence
258 or worsening of depression, suicidal thoughts or behavior, and/or any unusual
259 changes in mood or behavior.

260
261 Pooled analyses of 199 placebo-controlled clinical trials (mono- and adjunctive
262 therapy) of 11 different AEDs showed that patients randomized to one of the
263 AEDs had approximately twice the risk (adjusted Relative Risk 1.8, 95% CI:1.2,
264 2.7) of suicidal thinking or behavior compared to patients randomized to placebo.
265 In these trials, which had a median treatment duration of 12 weeks, the estimated
266 incidence rate of suicidal behavior or ideation among 27,863 AED treated
267 patients was 0.43%, compared to 0.24% among 16,029 placebo treated patients,
268 representing an increase of approximately one case of suicidal thinking or
269 behavior for every 530 patients treated. There were four suicides in drug treated
270 patients in the trials and none in placebo treated patients, but the number is too
271 small to allow any conclusion about drug effect on suicide.

272
273 The increased risk of suicidal thoughts or behavior with AEDs was observed as
274 early as one week after starting drug treatment with AEDs and persisted for the
275 duration of treatment assessed. Because most trials included in the analysis did
276 not extend beyond 24 weeks, the risk of suicidal thoughts or behavior beyond 24
277 weeks could not be assessed.

278
279 The risk of suicidal thoughts or behavior was generally consistent among drugs
280 in the data analyzed. The finding of increased risk with AEDs of varying
281 mechanisms of action and across a range of indications suggests that the risk
282 applies to all AEDs used for any indication. The risk did not vary substantially by
283 age (5-100 years) in the clinical trials analyzed. Table 1 shows absolute and
284 relative risk by indication for all evaluated AEDs.

285
286

Table 1. Risk by Indication for Antiepileptic Drugs in the Pooled Analysis

Indication	Placebo Patients with Events per 1000 Patients	Drug Patients with Events per 1000 Patients	Relative Risk: Incidence of Drug Events in Drug Patients/Incidence in Placebo Patients	Risk Difference: Additional Drug Patients with Events per 1000 Patients
Epilepsy	1.0	3.4	3.5	2.4
Psychiatric	5.7	8.5	1.5	2.9
Other	1.0	1.8	1.9	0.9
Total	2.4	4.3	1.8	1.9

287
288 The relative risk for suicidal thoughts or behavior was higher in clinical trials for
289 epilepsy than in clinical trials for psychiatric or other conditions, but the absolute
290 risk differences were similar for the epilepsy and psychiatric indications.
291

292 Anyone considering prescribing SABRIL or any other AED must balance the risk
293 of suicidal thoughts or behavior with the risk of untreated illness. Epilepsy and
294 many other illnesses for which AEDs are prescribed are themselves associated
295 with morbidity and mortality and an increased risk of suicidal thoughts and
296 behavior. Should suicidal thoughts and behavior emerge during treatment, the
297 prescriber needs to consider whether the emergence of these symptoms in any
298 given patient may be related to the illness being treated.

299
300 Patients, their caregivers, and families should be informed that AEDs increase
301 the risk of suicidal thoughts and behavior and should be advised of the need to
302 be alert for the emergence or worsening of the signs and symptoms of
303 depression, any unusual changes in mood or behavior, or the emergence of
304 suicidal thoughts, behavior, or thoughts about self-harm. Behaviors of concern
305 should be reported immediately to healthcare providers.

306 307 **5.6 Withdrawal of Antiepileptic Drugs (AEDs)**

308
309 As with all AEDs, SABRIL should be withdrawn gradually. In controlled clinical
310 studies in adults with CPS, SABRIL was tapered by decreasing the daily dose 1
311 g/day on a weekly basis until discontinued [see DOSAGE AND
312 ADMINISTRATION, General Dosing Considerations (2.3), PATIENT
313 COUNSELING INFORMATION, Withdrawal of SABRIL Therapy (17.4)].

314 315 **5.7 Anemia**

316 In North American controlled trials, 5.7% of patients (16/280) receiving SABRIL
317 and 1.6% of patients (3/188) receiving placebo had adverse events of anemia
318 and/or met criteria for potentially clinically important hematology changes
319 involving hemoglobin, hematocrit, and/or RBC indices. Across U.S. controlled
320 trials, there were mean decreases in hemoglobin of about 3% and 0% in SABRIL
321 and placebo-treated patients, respectively, and in hematocrit of about 1% in
322 Sabril treated patients compared to a gain of about 1% in patients treated with
323 placebo.

324
325 In controlled and open label epilepsy trials, 3 SABRIL patients (0.06%, 3/4855)
326 discontinued for anemia and 2 SABRIL patients experienced unexplained
327 declines in hemoglobin to below 8 g/dL and/or hematocrit below 24%.

328 329 **5.8 Somnolence and Fatigue**

330 SABRIL causes somnolence and fatigue. Patients should be advised not to drive
331 a car or operate other complex machinery until they are familiar with the effects
332 of SABRIL on their ability to perform such activities.

333
334 Pooled data from two SABRIL controlled trials demonstrated that 24% (54/222)
335 of SABRIL patients experienced somnolence compared to 10% (14/135) of
336 placebo patients. In those same studies, 28% of SABRIL patients experienced
337 fatigue compared to 15% (20/135) of placebo patients. Almost 1% of SABRIL

338 patients discontinued from clinical trials for somnolence and almost 1%
339 discontinued for fatigue.

340

341 **5.9 Peripheral Neuropathy**

342 SABRIL causes symptoms of peripheral neuropathy. In a pool of North American
343 controlled and uncontrolled epilepsy studies, 4.2% (19/457) of SABRIL patients
344 developed signs and/or symptoms of peripheral neuropathy. In the subset of
345 North American placebo-controlled epilepsy trials, 1.4% (4/280) of SABRIL
346 treated patients and no (0/188) placebo patients developed signs and/or
347 symptoms of peripheral neuropathy. Initial manifestations of peripheral
348 neuropathy in these trials included, in some combination, symptoms of
349 numbness or tingling in the toes or feet, signs of reduced distal lower limb
350 vibration or position sensation, or progressive loss of reflexes, starting at the
351 ankles. Clinical studies in the development program were not designed to
352 investigate peripheral neuropathy systematically and did not include nerve
353 conduction studies, quantitative sensory testing, or skin or nerve biopsy. There is
354 insufficient evidence to determine if development of these signs and symptoms
355 were related to duration of SABRIL treatment, cumulative dose, or if the findings
356 of peripheral neuropathy were completely reversible upon discontinuation of
357 SABRIL.

358

359 **5.10 Weight Gain**

360 SABRIL causes weight gain. Data pooled from randomized controlled trials found
361 that 17% (77/443) of SABRIL patients versus 8% (22/275) of placebo patients
362 gained $\geq 7\%$ of baseline body weight. In these same trials, the mean weight
363 change among SABRIL patients was 3.5 kg compared to 1.6 kg for placebo
364 patients. In all epilepsy trials, 0.6% (31/4855) of SABRIL patients discontinued for
365 weight gain. The long term effects of SABRIL related weight gain are not known.
366 Weight gain was not related to the occurrence of edema.

367

368 **5.11 Edema**

369 SABRIL causes edema. Pooled data from controlled trials demonstrated
370 increased risk among SABRIL patients compared to placebo patients for
371 peripheral edema (SABRIL 2%, placebo 1%), and edema (SABRIL 1%, placebo
372 0%). In these studies, one SABRIL and no placebo patients discontinued for an
373 edema related AE. There was no apparent association between edema and
374 cardiovascular adverse events such as hypertension or congestive heart failure.
375 Edema was not associated with laboratory changes suggestive of deterioration in
376 renal or hepatic function.

377

378 **6 ADVERSE REACTIONS**

379 SABRIL causes permanent damage to vision in a high percentage of patients
380 [see BOXED WARNING: VISION LOSS and WARNINGS AND PRECAUTIONS,
381 Vision Loss (5.1)].

382

383 **6.1 Adverse Reactions in Clinical Trials**

384 Because clinical trials are conducted under widely varying conditions, adverse
385 reaction rates observed in the clinical trials of a drug cannot be directly compared
386 to rates in the clinical trials of another drug and may not reflect the rates
387 observed in practice.

388

389 **Adverse Reactions in U.S. and Primary Non-U.S. Clinical Studies**

390 In U.S. and primary non-U.S. clinical studies of 4,079 SABRIL treated patients,
391 the most commonly observed ($\geq 5\%$) adverse reactions associated with the use
392 of SABRIL in combination with other AEDs were headache (18%), somnolence
393 (17%), fatigue (16%), dizziness (15%), convulsion (11%), nasopharyngitis (10%),
394 weight increased (10%), upper respiratory tract infection (10%), visual field defect
395 (9%), depression (8%), tremor (7%), nystagmus (7%), nausea (7%), diarrhea
396 (7%), memory impairment (7%), insomnia (7%), irritability (7%), coordination
397 abnormal (7%), vision blurred (6%), diplopia (6%), vomiting (6%), influenza (6%),
398 pyrexia (6%), and rash (6%).

399

400 The adverse reactions most commonly associated with SABRIL treatment
401 discontinuation in $\geq 1\%$ of patients were convulsion (1.4%) and depression
402 (1.5%).

403

404 **Most Common Adverse Reactions in Controlled Clinical Trials**

405

406 *Refractory Complex Partial Seizures in Adults*

407 Table 2 lists the treatment emergent adverse reactions that occurred in $\geq 2\%$
408 and more than one patient per SABRIL-treated group and that occurred more
409 frequently than in placebo patients from 2 U.S. add-on clinical studies of
410 refractory CPS in adults.

411

Table 2. Treatment Emergent Adverse Reactions Occurring in $\geq 2\%$ and More than One Patient per SABRIL-Treated Group and More Frequently than in Placebo Patients (Studies 024 and 025)

Body System Preferred Term	SABRIL 3 g/day (N=134) n(%)	SABRIL 6 g/day (N=43) n(%)	Placebo (N=135) n(%)
Ear Disorders			
Tinnitus	3 (2)	0 (0)	2 (1)
Vertigo	3 (2)	2 (5)	2 (1)
Eye Disorders			
Vision blurred	18 (13)	7 (16)	7 (5)
Diplopia	9 (7)	7 (16)	4 (3)
Asthenopia	3 (2)	1 (2)	0 (0)
Eye pain	0 (0)	2 (5)	0 (0)
Gastrointestinal Disorders			
Diarrhoea	14 (10)	7 (16)	10 (7)
Nausea	13 (10)	1 (2)	11 (8)
Vomiting	9 (7)	4 (9)	8 (6)
Constipation	11 (8)	2 (5)	4 (3)
Abdominal pain upper	7 (5)	2 (5)	2 (1)

FDA Approved Labeling for NDA 020427 dated 8/21/09

Page 13

Table 2. Treatment Emergent Adverse Reactions Occurring in ≥ 2% and More than One Patient per SABRIL-Treated Group and More Frequently than in Placebo Patients (Studies 024 and 025)

Body System Preferred Term	SABRIL 3 g/day (N=134) n(%)	SABRIL 6 g/day (N=43) n(%)	Placebo (N=135) n(%)
Dyspepsia	6 (4)	2 (5)	4 (3)
Stomach discomfort	5 (4)	1 (2)	1 (1)
Abdominal pain	4 (3)	1 (2)	2 (1)
Toothache	3 (2)	2 (5)	3 (2)
Abdominal distension	3 (2)	0 (0)	1 (1)
General Disorders			
Fatigue	31 (23)	17 (40)	21 (16)
Gait disturbance	8 (6)	5 (12)	9 (7)
Asthenia	7 (5)	3 (7)	2 (1)
Oedema peripheral	7 (5)	3 (7)	1 (1)
Fever	6 (4)	3 (7)	4 (3)
Chest pain	2 (1)	2 (5)	2 (1)
Thirst	3 (2)	0 (0)	0 (0)
Malaise	0 (0)	2 (5)	0 (0)
Infections			
Nasopharyngitis	19 (14)	4 (9)	14 (10)
Upper respiratory tract infection	10 (7)	4 (9)	8 (6)
Influenza	7 (5)	3 (7)	5 (4)
Urinary tract infection	5 (4)	2 (5)	0 (0)
Bronchitis	0 (0)	2 (5)	2 (1)
Injury			
Contusion	4 (3)	2 (5)	3 (2)
Joint sprain	2 (1)	1 (2)	1 (1)
Muscle strain	1 (1)	1 (2)	2 (1)
Wound secretion	0 (0)	1 (2)	0 (0)
Metabolism and Nutrition Disorders			
Increased appetite	2 (1)	2 (5)	1 (1)
Weight increased	8 (6)	6 (14)	4 (3)
Musculoskeletal Disorders			
Arthralgia	14 (10)	2 (5)	4 (3)
Back pain	6 (4)	3 (7)	3 (2)
Pain in extremity	8 (6)	1 (2)	5 (4)
Myalgia	4 (3)	2 (5)	2 (1)
Muscle twitching	1 (1)	4 (9)	2 (1)
Muscle spasms	4 (3)	0 (0)	1 (1)
Nervous System Disorders			
Headache	44 (33)	11 (26)	42 (31)
Somnolence	29 (22)	11 (26)	18 (13)
Dizziness	32 (24)	11 (26)	23 (17)
Nystagmus	17 (13)	8 (19)	12 (9)
Tremor	20 (15)	7 (16)	11 (8)
Memory impairment	9 (7)	7 (16)	4 (3)
Coordination abnormal	10 (7)	7 (16)	3 (2)
Disturbance in attention	12 (9)	0 (0)	1 (1)

Table 2. Treatment Emergent Adverse Reactions Occurring in ≥ 2% and More than One Patient per SABRIL-Treated Group and More Frequently than in Placebo Patients (Studies 024 and 025)

Body System Preferred Term	SABRIL 3 g/day (N=134) n(%)	SABRIL 6 g/day (N=43) n(%)	Placebo (N=135) n(%)
Sensory disturbance	6 (4)	3 (7)	3 (2)
Hyporeflexia	6 (4)	2 (5)	1 (1)
Paraesthesia	9 (7)	1 (2)	1 (1)
Lethargy	6 (4)	3 (7)	3 (2)
Hyperreflexia	5 (4)	1 (2)	4 (3)
Hypoaesthesia	5 (4)	2 (5)	2 (1)
Sedation	5 (4)	0 (0)	0 (0)
Status epilepticus	3 (2)	2 (5)	0 (0)
Dysarthria	3 (2)	1 (2)	1 (1)
Postictal state	3 (2)	0 (0)	1 (1)
Sensory loss	0 (0)	2 (5)	0 (0)
Psychiatric Disorders			
Irritability	10 (7)	10 (23)	10 (7)
Depression	8 (6)	6 (14)	4 (3)
Confusional state	5 (4)	6 (14)	1 (1)
Anxiety	6 (4)	0 (0)	4 (3)
Depressed mood	7 (5)	0 (0)	1 (1)
Thinking abnormal	4 (3)	3 (7)	0 (0)
Abnormal behaviour	4 (3)	2 (5)	1 (1)
Expressive language disorder	2 (1)	3 (7)	1 (1)
Nervousness	3 (2)	2 (5)	3 (2)
Abnormal dreams	2 (1)	2 (5)	1 (1)
Reproductive System			
Dysmenorrhoea	12 (9)	2 (5)	4 (3)
Erectile dysfunction	0 (0)	2 (5)	0 (0)
Respiratory and Thoracic Disorders			
Pharyngolaryngeal pain	10 (7)	6 (14)	7 (5)
Cough	3 (2)	6 (14)	9 (7)
Pulmonary congestion	0 (0)	2 (5)	1 (1)
Sinus headache	8 (6)	1 (2)	1 (1)
Skin and Subcutaneous Tissue Disorders			
Rash	6 (4)	2 (5)	6 (4)

412

413

6.2 Post Marketing Experience

414

The following serious adverse events have been reported since approval and use of SABRIL worldwide. All serious adverse events that are not listed above as adverse events reported in clinical trials, that are not relatively common in the population and are not too vague to be useful are listed in this section. These reactions are reported voluntarily from a population of uncertain size; therefore, it is not possible to estimate their frequency or establish a causal relationship to drug exposure. Events are categorized by system organ class.

415

416

417

418

419

420

- 421
422 **Birth Defects:** Congenital cardiac defects, congenital external ear anomaly,
423 congenital hemangioma, congenital hydronephrosis, congenital male genital
424 malformation, congenital oral malformation, congenital vesicoureteric reflux,
425 dentofacial anomaly, dysmorphism, fetal anticonvulsant syndrome, hamartomas,
426 hip dysplasia, limb malformation, limb reduction defect, low set ears, renal
427 aplasia, retinitis pigmentosa, supernumerary nipple, talipes
428
429 **Ear:** Deafness
430
431 **Endocrine:** Delayed puberty
432
433 **Gastrointestinal:** Gastrointestinal hemorrhage, esophagitis
434
435 **General:** Developmental delay, facial edema, malignant hyperthermia, multi-
436 organ failure
437
438 **Hepatobiliary:** Cholestasis
439
440 **Nervous System:** Dystonia, encephalopathy, hypertonia, hypotonia, muscle
441 spasticity, myoclonus, optic neuritis
442
443 **Psychiatric:** Acute psychosis, apathy, delirium, hypomania, neonatal agitation,
444 psychotic disorder
445
446 **Respiratory:** Laryngeal edema, pulmonary embolism, respiratory failure, stridor
447
448 **Skin and Subcutaneous Tissue:** Angioedema, maculo-papular rash, pruritus
449
450 **7 DRUG INTERACTIONS**
451
452 For detailed information about Drug Interactions see CLINICAL
453 PHARMACOLOGY, Pharmacokinetics, Drug Interactions (12.3).
454
455 **7.1 Phenytoin**
456 A 16% to 20% average reduction in total phenytoin plasma levels was reported in
457 controlled clinical studies.
458
459 **7.2 Other AEDs**
460 There are no clinically significant pharmacokinetic interactions between SABRIL
461 and either phenobarbital or sodium valproate. Based on population
462 pharmacokinetics, carbamazepine, clorazepate, primidone, and sodium valproate
463 appear to have no effect on plasma concentrations of vigabatrin.
464
465 **7.3 Clonazepam**

466 In a study of 12 healthy volunteers, clonazepam (0.5 mg) co-administration had
467 no effect on SABRIL (1.5 g twice daily) concentrations. SABRIL increases the
468 mean C_{max} of clonazepam by 30% and decreases the mean t_{max} by 45%.

469

470 **7.4 Oral Contraceptives**

471 SABRIL is unlikely to affect the efficacy of steroid oral contraceptives.

472

473 **7.5 Drug-Laboratory Test Interactions**

474 SABRIL decreases alanine transaminase (ALT) and aspartate transaminase
475 (AST) plasma activity in up to 90% of patients. In some patients, these enzymes
476 become undetectable. The suppression of ALT and AST activity by SABRIL may
477 preclude the use of these markers, especially ALT, to detect early hepatic injury.

478

479 SABRIL may increase the amount of amino acids in the urine, possibly leading to
480 a false positive test for certain rare genetic metabolic diseases (e.g., alpha
481 aminoacidic aciduria).

482

483 **8 USE IN SPECIFIC POPULATIONS**

484

485 **8.1 Pregnancy**

486 Pregnancy Category C. Vigabatrin produced developmental toxicity, including
487 teratogenic and neurohistopathological effects, when administered to pregnant
488 animals at clinically relevant doses. In addition, developmental neurotoxicity was
489 observed in rats treated with vigabatrin during a period of postnatal development
490 corresponding to the third trimester of human pregnancy. There are no adequate
491 and well-controlled studies in pregnant women. SABRIL should be used during
492 pregnancy only if the potential benefit justifies the potential risk to the fetus.

493

494 Administration of vigabatrin (oral doses of 50 to 200 mg/kg) to pregnant rabbits
495 throughout the period of organogenesis was associated with an increased
496 incidence of malformations (cleft palate) and embryo-fetal death; these findings
497 were observed in two separate studies. The no-effect dose for teratogenicity and
498 embryoletality in rabbits (100 mg/kg) is approximately 1/2 the maximum
499 recommended human dose (MRHD) of 3 g/day on a body surface area (mg/m^2)
500 basis. In rats, oral administration of vigabatrin (50, 100, or 150 mg/kg) throughout
501 organogenesis resulted in decreased fetal body weights and increased
502 incidences of fetal anatomic variations. The no-effect dose for embryo-fetal
503 toxicity in rats (50 mg/kg) is approximately 1/5 the MRHD on a mg/m^2 basis. Oral
504 administration of vigabatrin (50, 100, 150 mg/kg) to rats from the latter part of
505 pregnancy through weaning produced long-term neurohistopathological
506 (hippocampal vacuolation) and neurobehavioral (convulsions) abnormalities in
507 the offspring. A no-effect dose for developmental neurotoxicity in rats was not
508 established; the low-effect dose (50 mg/kg) is approximately 1/5 the MRHD on a
509 mg/m^2 basis.

510

511 In a published study, vigabatrin (300 or 450 mg/kg) was administered by
512 intraperitoneal injection to a mutant mouse strain on a single day during
513 organogenesis (day 7, 8, 9, 10, 11, or 12). An increase in malformations
514 (including cleft palate) was observed at both doses.

515
516 Oral administration of vigabatrin (5, 15, or 50 mg/kg) to young rats during the
517 neonatal and juvenile periods of development (postnatal days 4-65) produced
518 neurobehavioral (convulsions, neuromotor impairment, learning deficits) and
519 neurohistopathological (brain vacuolation, decreased myelination, and retinal
520 dysplasia) abnormalities in treated animals. The early postnatal period in rats is
521 generally thought to correspond to late pregnancy in humans in terms of brain
522 development. The no-effect dose for developmental neurotoxicity in juvenile rats
523 (5 mg/kg) was associated with plasma vigabatrin exposures (AUC) less than 1/30
524 of those measured in pediatric patients receiving an oral dose of 50 mg/kg.

525
526 **Pregnancy Registry:** To provide information regarding the effects of *in utero*
527 exposure to SABRIL, physicians are advised to recommend that pregnant patients
528 taking SABRIL enroll in the North American Antiepileptic Drug (NAAED) Pregnancy
529 Registry. This can be done by calling the toll free number 1-888-233-2334, and
530 must be done by patients themselves. Information on the registry can also be
531 found at the website <http://www.aedpregnancyregistry.org/>.

532

533 **8.2 Nursing Mothers**

534 Vigabatrin is excreted in human milk. Because of the potential for serious
535 adverse reactions from vigabatrin in nursing infants [see WARNINGS AND
536 PRECAUTIONS, MRI Abnormalities (5.3) and Neurotoxicity (5.4)], a decision
537 should be made whether to discontinue nursing or to discontinue the drug, taking
538 into account the importance of the drug to the mother.

539

540 **8.3 Pediatric Use**

541 The safety and efficacy of SABRIL in pediatric patients (<16 years of age) with
542 CPS has not been established.

543

544 Abnormal MRI signal changes were observed in infants [see WARNINGS AND
545 PRECAUTIONS, MRI Abnormalities (5.3) and Neurotoxicity (5.4)].

546

547 Oral administration of vigabatrin (5, 15, or 50 mg/kg) to young rats during the
548 neonatal and juvenile periods of development (postnatal days 4-65) produced
549 neurobehavioral (convulsions, neuromotor impairment, learning deficits) and
550 neurohistopathological (brain vacuolation, decreased myelination, and retinal
551 dysplasia) abnormalities in treated animals. The no-effect dose for
552 developmental neurotoxicity in juvenile rats (5 mg/kg) was associated with
553 plasma vigabatrin exposures (AUC) less than 1/30 of those measured in pediatric
554 patients receiving an oral dose of 50 mg/kg.

555

556 **8.4 Geriatric Use**

557 Clinical studies of vigabatrin did not include sufficient numbers of patients aged
558 65 and over to determine whether they responded differently from younger
559 patients.

560
561 Vigabatrin is known to be substantially excreted by the kidney, and the risk of
562 toxic reactions to this drug may be greater in patients with impaired renal
563 function. Because elderly patients are more likely to have decreased renal
564 function, care should be taken in dose selection, and it may be useful to monitor
565 renal function.

566
567 Oral administration of a single dose of 1.5 g of vigabatrin to elderly (>65 years)
568 patients with reduced creatinine clearance (<50 mL/min) was associated with
569 moderate to severe sedation and confusion in 4 of 5 patients, lasting up to 5
570 days. The renal clearance of vigabatrin was 36% lower in healthy elderly subjects
571 (>65 years) than in young healthy males. Adjustment of dose or frequency of
572 administration should be considered. Such patients may respond to a lower
573 maintenance dose [see CLINICAL PHARMACOLOGY, Pharmacokinetics, Renal
574 Impairment (12.3) and DOSAGE AND ADMINISTRATION, Patients with Renal
575 Impairment (2.2)].

576
577 Other reported clinical experience has not identified differences in responses
578 between the elderly and younger patients.

579

580 **8.5 Renal Impairment**

581 Dose adjustment, including initiating treatment with a lower dose, is necessary in
582 patients with mild (creatinine clearance >50-80 mL/min), moderate (creatinine
583 clearance >30-50 mL/min) and severe (creatinine clearance >10-30 mL/min)
584 renal impairment [see CLINICAL PHARMACOLOGY, Pharmacokinetics, Renal
585 Impairment (12.3) and DOSAGE AND ADMINISTRATION, Patients with Renal
586 Impairment (2.2)].

587

588 **9 DRUG ABUSE AND DEPENDENCE**

589

590 **9.1 Controlled Substance Class**

591 Vigabatrin is not a controlled substance.

592

593 **9.2 Abuse**

594 Vigabatrin did not produce adverse events or overt behaviors associated with
595 abuse when administered to humans or animals. It is not possible to predict the
596 extent to which a CNS active drug will be misused, diverted, and/or abused once
597 marketed. Consequently, physicians should carefully evaluate patients for history
598 of drug abuse and follow such patients closely, observing them for signs of
599 misuse or abuse of vigabatrin (e.g., incrementation of dose, drug-seeking
600 behavior).

601

602 **9.3 Dependence**

603 Following chronic administration of vigabatrin to animals, there were no apparent
604 withdrawal signs upon drug discontinuation. However, as with all AEDs,
605 vigabatrin should be withdrawn gradually to minimize increased seizure
606 frequency [see WARNINGS AND PRECAUTIONS, Withdrawal of Antiepileptic
607 Drugs (AEDs) (5.6) and PATIENT COUNSELING INFORMATION, Withdrawal of
608 SABRIL Therapy (17.4)].

609

610 **10 OVERDOSAGE**

611

612 **10.1 Signs, Symptoms, and Laboratory Findings of Overdosage**

613 Confirmed and/or suspected vigabatrin overdoses have been reported during
614 clinical trials and in post marketing surveillance. No vigabatrin overdoses resulted
615 in death. When reported, the vigabatrin dose ingested ranged from 3 g to 90 g,
616 but most were between 7.5 g and 30 g. Nearly half the cases involved multiple
617 drug ingestions including carbamazepine, barbiturates, benzodiazepines,
618 lamotrigine, valproic acid, acetaminophen, and/or chlorpheniramine.

619

620 Coma, unconsciousness, and/or drowsiness were described in the majority of
621 cases of vigabatrin overdose. Other less commonly reported symptoms included
622 vertigo, psychosis, apnea or respiratory depression, bradycardia, agitation,
623 irritability, confusion, headache, hypotension, abnormal behavior, increased
624 seizure activity, status epilepticus, and speech disorder. These symptoms
625 resolved with supportive care.

626

627 **10.2 Treatment or Management for Overdosage**

628 There is no specific antidote for SABRIL overdose. Standard measures to
629 remove unabsorbed drug should be used, including elimination by emesis or
630 gastric lavage. Supportive measures should be employed, including monitoring of
631 vital signs and observation of the clinical status of the patients.

632

633 In an *in vitro* study, activated charcoal did not significantly adsorb vigabatrin.

634

635 The effectiveness of hemodialysis in the treatment of SABRIL overdose is
636 unknown. In isolated case reports in renal failure patients receiving therapeutic
637 doses of vigabatrin, hemodialysis reduced vigabatrin plasma concentrations by
638 40% to 60%.

639

640 **11 DESCRIPTION**

641

Table 3. Description

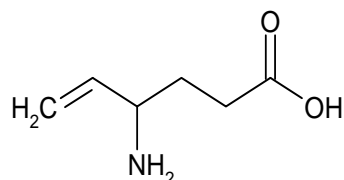
Proprietary Name:	SABRIL [®]
Established Name:	Vigabatrin Tablet
Dosage Form:	White, film-coated tablet
Route of	

FDA Approved Labeling for NDA 020427 dated 8/21/09

Page 20

Table 3. Description

Administration:	Oral
Pharmacologic Class of Drug:	Antiepileptic
Chemical Name:	(±) 4-amino-5-hexenoic acid
Structural Formula:	



642
643 SABRIL (vigabatrin) is available as a white, film-coated tablet for oral
644 administration. Each tablet contains 500 mg vigabatrin. Tablets also contain as
645 inactive ingredients: hydroxypropyl methylcellulose, magnesium stearate,
646 microcrystalline cellulose, polyethylene glycols, povidone, sodium starch
647 glycolate, and titanium dioxide. Vigabatrin is an oral antiepileptic drug with the
648 chemical name (±) 4-amino-5-hexenoic acid. It is a racemate consisting of two
649 enantiomers. The molecular formula is C₆H₁₁NO₂ and the molecular weight is
650 129.16.

651
652 Vigabatrin is a white to off-white powder which is freely soluble in water, slightly
653 soluble in methyl alcohol, very slightly soluble in ethyl alcohol and chloroform,
654 and insoluble in toluene and hexane. The pH of a 1% aqueous solution is about
655 6.9. The n-octanol/water partition coefficient of vigabatrin is about 0.011 (log
656 *P*=-1.96) at physiologic pH. Vigabatrin melts with decomposition in a 3-degree
657 range within the temperature interval of 171°C to 176°C. The dissociation
658 constants (pK_a) of vigabatrin are 4 and 9.7 at room temperature (25°C).

659 12 CLINICAL PHARMACOLOGY

660 661 12.1 Mechanism of Action

662 The precise mechanism of vigabatrin's anti-seizure effect is unknown, but it is
663 believed to be the result of its action as an irreversible inhibitor of γ -aminobutyric
664 acid transaminase (GABA-T), the enzyme responsible for the metabolism of the
665 inhibitory neurotransmitter GABA. This action results in increased levels of
666 GABA in the central nervous system.

667
668 No direct correlation between plasma concentration and efficacy has been
669 established. The duration of drug effect is presumed to be dependent on the rate
670 of enzyme re-synthesis rather than on the rate of elimination of the drug from the
671 systemic circulation.

672

673 **12.2 Pharmacodynamics**

674 ***Effects on Electrocardiogram***

675 There is no indication of a QT/QTc prolonging effect of SABRIL in single doses
676 up to 6.0 g. In a randomized, placebo-controlled, crossover study, 58 healthy
677 subjects were administered a single oral dose of SABRIL (3 g and 6 g) and
678 placebo. Peak concentrations for 6.0 g SABRIL were approximately 2-fold higher
679 than the peak concentrations following the 3.0 g single oral dose.

680

681 **12.3 Pharmacokinetics**

682 Vigabatrin displayed linear pharmacokinetics after administration of single doses
683 ranging from 0.5 g to 4 g, and after administration of repeated doses of 0.5 g and
684 2.0 g twice daily with a half-life of about 7.5 hours. Bioequivalence has been
685 established between the oral solution and tablet formulations.

686

687 ***Absorption***

688 Following oral administration, vigabatrin is essentially completely absorbed.
689 Time to maximum concentration (t_{max}) is approximately 1 hour following single
690 and multiple doses. There was little accumulation with multiple dosing. A food
691 effect study involving administration of vigabatrin to healthy volunteers under
692 fasting and fed conditions indicated that the C_{max} was decreased by 33%, t_{max}
693 was increased to 2 hours, and AUC was unchanged under fed conditions [see
694 DOSAGE AND ADMINISTRATION (2)].

695

696 ***Distribution***

697 Vigabatrin does not bind to plasma proteins. Vigabatrin is widely distributed
698 throughout the body; mean steady-state volume of distribution is 1.1 L/Kg (CV =
699 20%).

700

701 ***Metabolism and Elimination***

702 Vigabatrin is not significantly metabolized; it is eliminated primarily through renal
703 excretion. The half-life of vigabatrin is about 7.5 hours. Following administration
704 of ^{14}C -vigabatrin to healthy male volunteers, about 95% of total radioactivity was
705 recovered in the urine over 72 hours with the parent drug representing about
706 80% of this. Vigabatrin induces CYP2C9, but does not induce other hepatic
707 cytochrome P450 enzyme systems.

708

709 ***Pharmacokinetics in Special Populations***

710

711 ***Geriatric***

712 The renal clearance of vigabatrin in healthy elderly patients (≥ 65 years of age)
713 was 36% less than those in healthy younger patients. This finding is confirmed
714 by an analysis of data from a controlled clinical trial.

715

716 ***Gender***

717 No gender differences were observed for the pharmacokinetic parameters of
718 vigabatrin in patients.

719
720 *Race*

721 No specific study was conducted to investigate the effects of race on SABRIL
722 pharmacokinetics. A cross study comparison between 23 Caucasian and 7
723 Japanese patients who received 1, 2, and 4 g of vigabatrin indicated that the
724 AUC, C_{max} , and half-life were similar for the two populations. However, the
725 mean renal clearance of Caucasians (5.2 L/hr) was about 25% higher than the
726 Japanese (4 .0 L/hr). Inter-subject variability in renal clearance was 20% in
727 Caucasians and was 30% in Japanese.

728
729 *Renal Impairment*

730 Mean AUC increased by 30% and the terminal half-life increased by 55% (8.1
731 hr vs 12.5 hr) in patients with mild renal impairment (CLcr from >50-80 mL/min)
732 in comparison to normal subjects.

733
734 Mean AUC increased by two-fold and the terminal half-life increased by two-
735 fold in patients with moderate renal impairment (CLcr from >30-50 mL/min) in
736 comparison to normal subjects.

737
738 Mean AUC increased by 4.5-fold and the terminal half-life increased by 3.5-fold
739 in patients with severe renal impairment (CLcr from >10-30 mL/min) in
740 comparison to normal subjects.

741
742 Dosage adjustment, including starting at a lower dose, is recommended for
743 patients with any degree of renal impairment [see USE IN SPECIFIC
744 POPULATIONS, Renal Impairment (8.5) and DOSAGE AND
745 ADMINISTRATION, Patients with Renal Impairment (2.2)].

746
747 *Hepatic Impairment*

748 Vigabatrin is not significantly metabolized. The pharmacokinetics of vigabatrin
749 in patients with impaired liver function have not been studied.

750
751 ***Drug Interactions***

752
753 *Phenytoin*

754 A 16% to 20% average reduction in total phenytoin plasma levels was reported
755 in controlled clinical studies. *In vitro* drug metabolism studies indicate that
756 decreased phenytoin concentrations upon addition of vigabatrin therapy are
757 likely to be the result of induction of cytochrome P450 2C enzymes in some
758 patients. Although phenytoin dose adjustments are not routinely required, dose
759 adjustment of phenytoin should be considered if clinically indicated.

760
761 *Other AEDs*

762 When co-administered with vigabatrin, phenobarbital concentration (from
763 phenobarbital or primidone) was reduced by an average of 8% to 16%, and
764 sodium valproate plasma concentrations were reduced by an average of 8%.
765 These reductions did not appear to be clinically relevant. Based on population
766 pharmacokinetics, carbamazepine, clorazepate, primidone, and sodium
767 valproate appear to have no effect on plasma concentrations of vigabatrin.
768

769 *Clonazepam*

770 In a study of 12 healthy volunteers, clonazepam (0.5 mg) co-administration had
771 no effect on SABRIL (1.5 g twice daily) concentrations. SABRIL increases the
772 mean C_{max} of clonazepam by 30% and decreases the mean t_{max} by 45%.
773

774 *Alcohol*

775 Co-administration of ethanol (0.6 g/kg) with vigabatrin (1.5 g twice daily)
776 indicated that neither drug influences the pharmacokinetics of the other.
777

778 *Oral Contraceptives*

779 In a double-blind, placebo-controlled study using a combination oral
780 contraceptive containing 30 μ g ethinyl estradiol and 150 μ g levonorgestrel,
781 vigabatrin (3 g/day) did not interfere significantly with the cytochrome P450
782 isoenzyme (CYP3A)-mediated metabolism of the contraceptive tested. Based
783 on this study, vigabatrin is unlikely to affect the efficacy of steroid oral
784 contraceptives. Additionally, no significant difference in pharmacokinetic
785 parameters (elimination half-life, AUC, C_{max} , apparent oral clearance, time to
786 peak, and apparent volume of distribution) of vigabatrin were found after
787 treatment with ethinyl estradiol and levonorgestrel.
788

789 **13 NONCLINICAL TOXICOLOGY**

791 **13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility**

792 Vigabatrin showed no carcinogenic potential in mouse or rat when given in the
793 diet at doses up to 150 mg/kg/day for 18 months (mouse) or at doses up to 150
794 mg/kg/day for 2 years (rat). These doses are less than the maximum
795 recommended human dose (MRHD) of 3 g/day on a mg/m^2 basis.
796

797 Vigabatrin was negative in *in vitro* (Ames, CHO/HGPRT mammalian cell forward
798 gene mutation, chromosomal aberration in rat lymphocytes) and in *in vivo*
799 (mouse bone marrow micronucleus) assays.
800

801 No adverse effects on male or female fertility were observed in rats at oral doses
802 up to 150 mg/kg/day (approximately 1/2 the MRHD on a mg/m^2 basis).
803

804 **14 CLINICAL STUDIES**

806 **14.1 Complex Partial Seizures in Adults**

807 The effectiveness of SABRIL as adjunctive therapy in adult patients with CPS
808 was established in two U.S. multicenter, double-blind, placebo-controlled,
809 parallel-group clinical studies. A total of 357 adults (age 18 to 60 years) with
810 CPS, with or without secondary generalization were enrolled (Studies 1 and 2).
811 Patients were required to be on an adequate and stable dose of an
812 anticonvulsant, and have a history of failure on an adequate regimen of
813 carbamazepine or phenytoin. Patients had a history of about 8 seizures per
814 month (median) for about 20 years (median) prior to entrance into the study.
815 These studies were not capable by design of demonstrating direct superiority of
816 SABRIL over any other anticonvulsant added to a regimen to which the patient
817 had not adequately responded. Further, in these studies patients had previously
818 been treated with a limited range of anticonvulsants.

819
820 The primary measure of efficacy was the patient's reduction in mean monthly
821 frequency of complex partial seizures plus partial seizures secondarily
822 generalized at end of study compared to baseline.

823
824 **Study 1**

825
826 Study 1 (N=174) was a randomized, double-blind, placebo-controlled, dose-
827 response study consisting of an 8-week baseline period followed by an 18-week
828 treatment period. Patients were randomized to receive placebo or 1, 3, or 6
829 g/day vigabatrin administered twice daily. During the first 6 weeks following
830 randomization, the dose was titrated upward beginning with 1 g/day and
831 increasing by 0.5 g/day on days 1 and 5 of each subsequent week in the 3 g/day
832 and 6 g/day groups, until the assigned dose was reached.

833
834 Results for the primary measure of effectiveness, reduction in mean monthly
835 frequency of Complex Partial Seizures, are shown in Table 4. The 3 g/day and 6
836 g/day dose groups were statistically significantly superior to placebo, but the 6
837 g/day dose was not superior to the 3 g/day dose.

838

Table 4. Median Monthly Frequency of Complex Partial Seizures+

	N	Baseline	Endstudy
Placebo	45	9.0	8.8
1 g/day SABRIL	45	8.5	7.7
3 g/day SABRIL	41	8.5	3.7*
6 g/day SABRIL	43	8.5	4.5*

*P<0.05 compared to placebo

+Including one patient with simple partial seizures with secondary generalization only

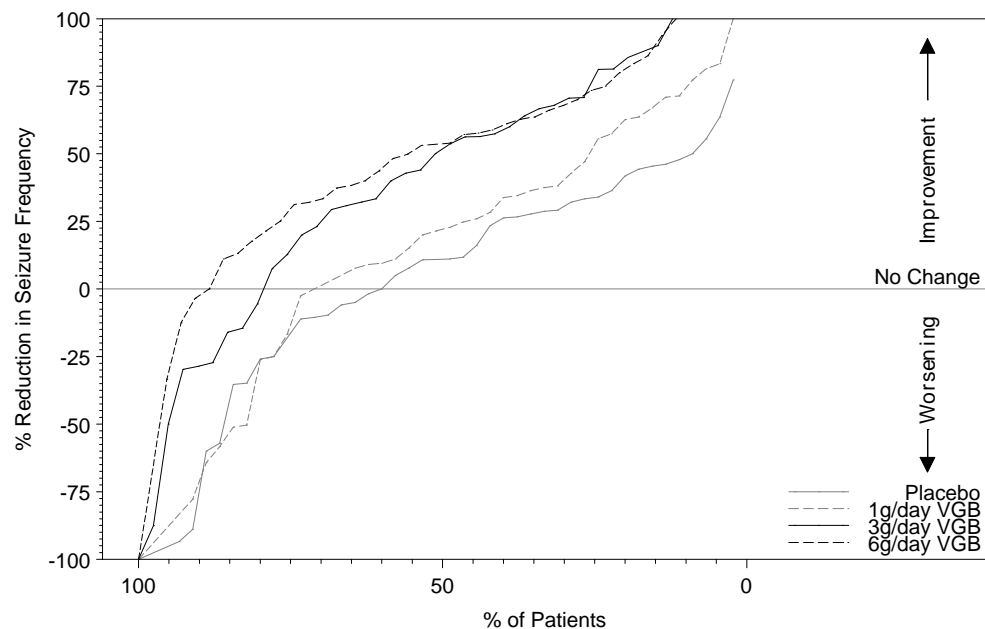
839

840 Figure 1 presents the percentage of patients (X-axis) with a percent reduction in
841 seizure frequency (responder rate) from baseline to the maintenance phase at
842 least as great as that represented on the Y-axis. A positive value on the Y-axis
843 indicates an improvement from baseline (i.e., a decrease in complex partial
844 seizure frequency), while a negative value indicates a worsening from baseline
845 (i.e., an increase in complex partial seizure frequency). Thus, in a display of this

FDA Approved Labeling for NDA 020427 dated 8/21/09
 Page 25

846 type, a curve for an effective treatment is shifted to the left of the curve for
 847 placebo. The proportion of patients achieving any particular level of reduction in
 848 complex partial seizure frequency was consistently higher for the SABRIL 3 and
 849 6 g/day groups compared to the placebo group. For example, 51% of patients
 850 randomized to SABRIL 3 g/day and 53% of patients randomized to Sabril 6 g/day
 851 experienced a 50% or greater reduction in seizure frequency, compared to 9% of
 852 patients randomized to placebo. Patients with an increase in seizure frequency
 853 >100% are represented on the Y-axis as equal to or greater than -100%.

854 **Figure 1. Percent Reduction from Baseline in Seizure Frequency**



855
 856
 857
 858

Study 2

859 Study 2 (N=183 randomized, 182 evaluated for efficacy) was a randomized,
 860 double-blind, placebo-controlled, parallel study consisting of an 8-week baseline
 861 period and a 16-week treatment period. During the first 4 weeks following
 862 randomization, the dose of vigabatrin was titrated upward beginning with 1 g/day
 863 and increased by 0.5 g/day on a weekly basis to the maintenance dose of 3
 864 g/day.
 865

Table 5. Median Monthly Frequency of Complex Partial Seizures

	N	Baseline	Endstudy
Placebo	90	9.0	7.5
3 g/day SABRIL	92	8.3	5.5*

*P<0.05 compared to placebo

866
 867
 868
 869

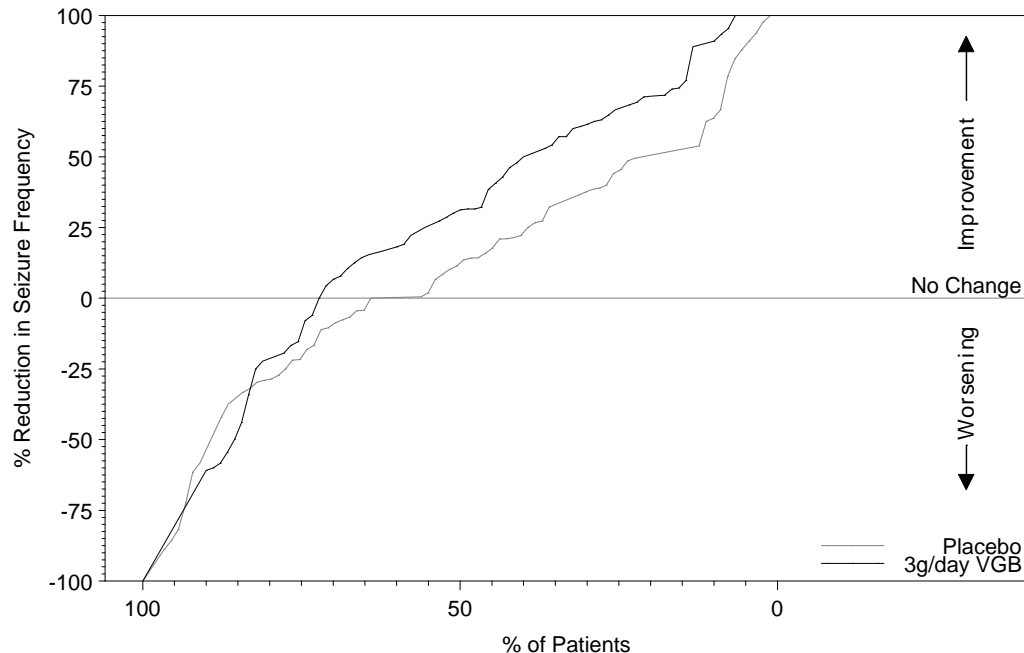
Results for the primary measure of effectiveness, reduction in mean monthly complex partial seizure frequency, are shown in Table 5. Vigabatrin 3 g/day was statistically significantly superior to placebo in reducing seizure frequency.

870

871 Figure 2 presents the percentage of patients (X-axis) with a percent reduction in
872 seizure frequency (responder rate) from baseline to the maintenance phase at
873 least as great as that represented on the Y-axis. A positive value on the Y-axis
874 indicates an improvement from baseline (i.e., a decrease in complex partial
875 seizure frequency), while a negative value indicates a worsening from baseline
876 (i.e., an increase in complex partial seizure frequency). Thus, in a display of this
877 type, a curve for an effective treatment is shifted to the left of the curve for
878 placebo. The proportion of patients achieving any particular level of reduction in
879 seizure frequency was consistently higher for the SABRIL 3 g/day group
880 compared to the placebo group. For example, 39% of patients randomized to
881 SABRIL (3 g/day) experienced a 50% or greater reduction in complex partial
882 seizure frequency, compared to 21% of patients randomized to placebo. Patients
883 with an increase in seizure frequency >100% are represented on the Y-axis as
884 equal to or greater than -100%.

885 **Figure 2. Percent Reduction from Baseline in Seizure Frequency**

886



887

888

889 For both studies, there was no difference in the effectiveness of vigabatrin
890 between male and female patients. Analyses of age and race were not possible
891 as nearly all patients were between the ages of 18 to 65 and Caucasian.

892

893 **15 REFERENCES**

894 None

895

896 **16 HOW SUPPLIED/STORAGE AND HANDLING**

897

FDA Approved Labeling for NDA 020427 dated 8/21/09
Page 27

898 **16.1 SABRIL Tablet**

899 Each SABRIL film-coated tablet contains 500 mg vigabatrin and is white, film-
900 coated, oval, biconvex, scored on one side, and debossed with OV 111 on the
901 other.

902
903 NDC 67386-111-01: Bottles of 100.

904
905 Store at 20-25°C (68-77°F). See USP controlled room temperature.

906
907 **17 PATIENT COUNSELING INFORMATION**

908 See FDA-Approved Patient Labeling (17.5)
909

910 Patients must be informed of the availability of a Medication Guide. Patients
911 must be instructed to read the Medication Guide prior to initiating treatment with
912 SABRIL and with each prescription refill. Doctors must review the SABRIL
913 Medication Guide with every patient prior to initiation of treatment. Patients
914 should be instructed to take SABRIL only as prescribed.

915
916 **17.1 Vision Loss**

917 Patients should be informed of the risk of permanent vision loss, particularly loss
918 of peripheral vision, from SABRIL, and the need for monitoring vision [see
919 WARNINGS AND PRECAUTIONS, Vision Loss (5.1)].

920
921 Monitoring of vision, including assessment of visual fields and visual acuity, is
922 required for adults at baseline (no later than 4 weeks after starting SABRIL) and
923 at least every 3 months while on therapy unless after repeated attempts it is not
924 possible. In those patients in whom vision testing is not possible, treatment may
925 continue according to clinical judgment with appropriate patient counseling and
926 with documentation in the SHARE program of the inability to test vision. Patients
927 should be informed that if baseline or subsequent vision is not normal, SABRIL
928 should only be used if the benefits of SABRIL treatment clearly outweigh the
929 risks of additional vision loss.

930
931 Patients should understand that vision testing may be insensitive and may not
932 detect vision loss before it is severe. Patients should also understand that if
933 vision loss is documented, such loss is irreversible.

934
935 Patients should be informed that if changes in vision are suspected, they should
936 notify their physician immediately.

937
938 **17.2 Suicidal Thinking and Behavior**

939
940 Patients, their caregiver(s), and families should be counseled that AEDs,
941 including SABRIL, may increase the risk of suicidal thoughts and behavior and
942 should be advised of the need to be alert for the emergence or worsening of
943 symptoms of depression, any unusual changes in mood or behavior, or the

FDA Approved Labeling for NDA 020427 dated 8/21/09

Page 28

944 emergence of suicidal thoughts, behavior, or thoughts of self-harm. Behaviors of
945 concern should be reported immediately to healthcare providers [see
946 WARNINGS AND PRECAUTIONS, Suicidal Behavior and Ideation (5.5)].
947

948 **17.3 Use in Pregnancy**

949 Patients should be instructed to notify their physician if they become pregnant or
950 intend to become pregnant during therapy, and to notify their physician if they are
951 breast feeding or intend to breast feed during therapy [see USE IN SPECIFIC
952 POPULATIONS, Pregnancy (8.1), and Nursing Mothers (8.2)].
953

954 Patients should be encouraged to enroll in the NAAED Pregnancy Registry if they
955 become pregnant. This registry is collecting information about the safety of
956 antiepileptic drugs during pregnancy. To enroll, patients can call the toll free
957 number 1-888-233-2334 [see USE IN SPECIFIC POPULATIONS, Pregnancy
958 (8.1)]. Information on the registry can also be found at the website
959 <http://www.aedpregnancyregistry.org/>.
960

961 **17.4 Withdrawal of SABRIL Therapy**

962 Patients should be told not to suddenly discontinue SABRIL therapy. As with all
963 AEDs, withdrawal should be gradual. In controlled clinical studies in adults with
964 CPS, vigabatrin was tapered by decreasing the daily dose 1 g/day on a weekly
965 basis until discontinued.
966

967 **17.5 FDA-Approved Medication Guide**

968

969

970 Manufactured by: Patheon
971 Cincinnati, OH 45237, U.S.A.

972

973 For: Lundbeck Inc.
974 Deerfield, IL 60015, U.S.A.

975



976

977

978 ® Trademark of Lundbeck Inc.

979 Issued: August 2009

70018014