

**Food and Drug Administration
Center for Drug Evaluation and Research
Final Summary Minutes of the Nonprescription Drugs Advisory Committee Meeting**

Location: All meeting participants were heard, viewed, captioned, and recorded for this advisory committee meeting via an online teleconferencing and/or video conferencing platform.

Topic: The committee discussed new data regarding the ‘Generally Recognized as Safe and Effective’ (GRASE) status of oral phenylephrine as a nasal decongestant that have become available since FDA last examined the issue.

These summary minutes for the September 11-12, 2023 meeting of the Nonprescription Drugs Advisory Committee of the Food and Drug Administration were approved on October 2, 2023.

I certify that I attended the September 11-12, 2023 meeting of the Nonprescription Drugs Advisory Committee (NDAC) of the Food and Drug Administration and that these minutes accurately reflect what transpired.

/s/
Jessica Seo, PharmD, MPH
Acting Designated Federal Officer, NDAC

/s/
Maria C. Coyle, PharmD, FCCP, BCPS,
BCACP, CLS
Acting Chairperson, NDAC

**Final Summary Minutes of the Nonprescription Drugs
Advisory Committee Meeting
September 11-12, 2023**

The Nonprescription Drugs Advisory Committee (NDAC) of the Food and Drug Administration, Center for Drug Evaluation and Research, met on September 11-12, 2023. The meeting presentations were heard, viewed, captioned, and recorded through an online video conferencing platform. Prior to the meeting, the members and temporary voting members were provided the briefing materials from the FDA and Consumer Health Products Association (CHPA). The meeting was called to order by Maria C. Coyle, PharmD, FCCP, BCPS, BCACP, CLS (Acting Chairperson). The conflict of interest statement was read into the record by Jessica Seo, PharmD, MPH (Acting Designated Federal Officer). There were approximately 273 people online on Day 1 and approximately 220 people online on Day 2. There were a total of 6 Open Public Hearing (OPH) speaker presentations.

A verbatim transcript will be available, in most instances, at approximately ten to twelve weeks following the meeting date.

Agenda:

The committee discussed new data regarding the ‘Generally Recognized as Safe and Effective’ (GRASE) status of oral phenylephrine as a nasal decongestant that have become available since FDA last examined the issue.

Attendance:

Nonprescription Drugs Advisory Committee Members Present (Voting): Kristy Brittain, PharmD, BCPS, CDCES; Stephen C. Clement, MD; Diane B. Ginsburg, PhD, MS, RPh, FASHP; Tonya S. King, PhD; Paul Pisarik, MD, MPH, FAAFP

Nonprescription Drugs Advisory Committee Members Not Present (Voting): Elma D. Baron, MD; Ruth M. Parker, MD, MACP; Katalin E. Roth, JD, MD; Leslie Walker-Harding, MD, FAAP, FSAHM

Nonprescription Drugs Advisory Committee Member Present (Non-Voting): Mark E. Dato, MD, PhD (*Industry Representative*)

Temporary Members (Voting): Maryann Amirshahi, PharmD, MD, MPH, PhD; Susan J. Blalock, PhD; Karim Anton Calis, PharmD, MPH, FASHP, FCCP; Maria C. Coyle, PharmD, FCCP, BCPS, BCACP, CLS (*Acting Chairperson*); Emma H. D’Agostino, PhD (*Acting Consumer Representative*); Mark Dykewicz, MD; William D. Figg, PharmD, MBA; Bridgette Jones, MD, MS; Esther Kim, MD, FARS; Jennifer Le, PharmD, MAS, FIDSA, FCCP, FCSHP; Jennifer A. Schwartzott, MS (*Patient Representative*)

FDA Participants (Non-Voting): Theresa Michele, MD; Nushin Todd, MD, PhD; Martha Lenhart, MD, PhD; Steven Adah, PhD; Peter Starke, MD; Ben Bishop, PharmD, MSc Reg Sci; Yunzhao Ren, MD, PhD; Tracy Pham, PharmD

Acting Designated Federal Officer (Non-Voting): Jessica Seo, PharmD, MPH

Open Public Hearing Speakers Present: Azza AbuDagga, MHA, PhD (Public Citizen); Eli O. Meltzer, MD; Randy C. Hatton, BPharm, PharmD, FCCP; Leslie Hendeles, PharmD; Elizabeth A. Farrington, BCNSP, BCPS, PharmD (American College of Clinical Pharmacy); Sophia Phillips, MS (National Center for Health Research)

The agenda was as follows:

DAY 1

Call to Order

Maria C. Coyle, PharmD, FCCP, BCPS, BCACP, CLS
Acting Chairperson, NDAC

Introduction of Committee and Conflict of Interest Statement

Jessica Seo, PharmD, MPH
Acting Designated Federal Officer, NDAC

INTRODUCTION AND REGULATORY HISTORY

Welcome and Introduction

Theresa Michele, MD
Director
Office of Nonprescription Drugs (ONPD)
Office of New Drugs (OND), CDER, FDA

Background and Regulatory History of Oral Phenylephrine

LCDR Ben Bishop, PharmD, MSc Reg Sci
Regulatory Review Officer
Division of Nonprescription Drugs I (DNPDI)
ONPD, OND, CDER, FDA

BREAK

FDA PRESENTATIONS

Clinical Pharmacology of Oral Phenylephrine

Yunzhao Ren, MD, PhD
Team Leader
Division of Inflammation & Immune Pharmacology (DIIP)
Office of Clinical Pharmacology (OCP)
Office of Translational Sciences (OTS)
CDER, FDA

FDA PRESENTATIONS (cont.)

Clinical Safety and Efficacy of Oral
Phenylephrine as a Nasal Decongestant

Peter Starke, MD, FAAP
Lead Clinical Reviewer
DNPDI, ONPD, OND, CDER, FDA

Sales of OTC Products Containing
Phenylephrine or Pseudoephedrine in
the United States

Tracy Pham, PharmD
Drug Utilization Analyst
Division of Epidemiology II (DEPI II)
Office of Surveillance and Epidemiology (OSE)
CDER, FDA

Clarifying Questions

LUNCH

INDUSTRY PRESENTATIONS

Introduction

Marcia D. Howard, PhD, CAE
Vice President, Regulatory & Scientific Affairs
Consumer Healthcare Products Association (CHPA)

Assessment of Nasal Congestion

Howard M. Druce, MD
Clinical Professor of Medicine
Division of Allergy, Immunology and Rheumatology
Department of Medicine
Rutgers New Jersey Medical School

Clinical Pharmacology of
Phenylephrine

Cathy K. Gelotte, PhD
Clinical Pharmacology Consultant

Efficacy

Howard M. Druce, MD

Discussion and Comparison of Meta-
Analyses

Chris M. Mullin, MS
Director, Global Strategy Services
North American Science Associates, LLC (NAMSA)

Benefit-Risk Profile

Marcia D. Howard, PhD, CAE

Clarifying questions

BREAK

OPEN PUBLIC HEARING

ADJOURNMENT

DAY 2

Call to Order

**Maria C. Coyle, PharmD, FCCP, BCPS,
BCACP, CLS**
Acting Chairperson, NDAC

Introduction of Committee

Jessica Seo, PharmD, MPH
Acting Designated Federal Officer, NDAC

Summary and Introduction to
Discussion

Martha Lenhart, MD, PhD
Deputy Director
DNPDI, ONPD, OND, CDER, FDA

Charge to the Advisory Committee

Martha Lenhart, MD, PhD

Questions to the Committee/Committee
Discussion

BREAK

Questions to the Committee/Committee Discussion (cont.)

LUNCH

Questions to the Committee/Committee Discussion (cont.)

ADJOURNMENT

Questions to the Committee:

1. **DISCUSSION:** Discuss the current scientific efficacy and pharmacokinetic data for phenylephrine.

Committee Discussion: *The Committee members discussed the current scientific efficacy data for oral phenylephrine and noted that while the results from older studies were questionable, they were in agreement the newer studies are credible and compelling with multiple trials failing to demonstrate relief of nasal congestion from use of phenylephrine in the populations studied. In discussing the pharmacokinetic data for phenylephrine, Committee members acknowledged the low bioavailability established for oral phenylephrine as being supportive of the lack of efficacy observed in relieving nasal congestion, with one member highlighting agreement with FDA's estimates of the low oral bioavailability for parent phenylephrine, and another member noting the lack of data that directly measures parent phenylephrine concentration in the nasal mucosa (i.e., the site of action). Committee members also briefly touched on issues such as the need to consider other factors contributing to nasal congestion, alternative therapies that are effective, and concerns with development of bacterial sinusitis as a potential complication of nasal congestion when*

effective treatment is delayed due to continued use of ineffective therapies such as phenylephrine. Please see the transcript for details of the Committee's discussion.

2. **VOTE:** Do the current scientific data that were presented support that the monograph dosage of orally administered phenylephrine is effective as a nasal decongestant?
 - a. If yes, discuss what data you consider supportive.
 - b. If no, discuss what additional data, if any, are needed to assess phenylephrine pharmacokinetics or efficacy.

Vote Result: Yes: 0 No: 16 Abstain: 0

Committee Discussion: *The Committee members unanimously voted “No” (16 to 0) and were in agreement that the current scientific data do not support that the monograph dosage of orally administered phenylephrine is effective as a nasal decongestant. There was limited disagreement regarding the need for additional studies to assess the pharmacokinetics or efficacy of phenylephrine, with many panel members dismissing any need for further research due to the compelling existing evidence. Please see the transcript for details of the Committee's discussion.*

3. **DISCUSSION:** Discuss whether the current scientific data that were presented support that a dose of orally administered phenylephrine higher than the monograph dosage would be safe and effective.

Committee Discussion: *The discussion among the Committee members revealed a broad consensus that the current data presented do not support pursuing higher doses of orally administered phenylephrine. While one member suggested exploration of higher doses for use of phenylephrine in a hospital setting, the Committee members were unanimous in their opinion that the scientific data presented do not support higher doses of phenylephrine for over-the-counter (OTC) use. Members cited reasons such as the pharmacokinetic data presented, potential cardiovascular safety risks, resource allocation, and the availability of effective alternatives as factors influencing their decision. Please see the transcript for details of the Committee's discussion.*

4. **DISCUSSION:** Discuss the implications for and communication strategies to consumers of the current oral phenylephrine data.

The Committee members' discussion on the implications for and communication strategies to consumers of the current phenylephrine data centered on the need for clear, transparent, and comprehensive communication to educate consumers about the efficacy of oral phenylephrine and provide guidance on alternative treatments, while also addressing safety concerns and potential impacts on the market and supply chain. Committee discussion included:

- *the potential for consumer confusion i.e., the timing of this advisory committee and the underlying scientific review, general safety of existing products, and management of home supplies;*
- *a recommendation for a phased and transparent approach to the Agency's communication to the public;*

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- *a suggestion for partnership with professional organizations and use of media to provide clear messaging from the Agency;*
- *education needed on combination products containing phenylephrine as well as on effective alternative treatments for nasal congestion;*
- *and a recommendation for a thoughtful rollout of decisions to minimize impacts to the market and consumers.*

Please see the transcript for details of the Committee's discussion.

The meeting was adjourned at approximately 11:56 a.m. ET.