DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Combination Products
15800 Crabbs Branch Way (HFG-3)
Suite 200
Rockville, MD 20855

Food and Drug Administration
Rockville MD 20857

April 19, 2005

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Angiotech BioCoatings
336 Summit Point Drive
Henrietta, NY 14467

Re: Request for Designation
Angiotech Antimicrobial Central Venous Catheter
Our file: RFD 2005.012
Dated: Undated
Received and Filed: April 8, 2005
Amended: April 19, 2005

Dear [ ]

The Food and Drug Administration (FDA) has completed its review of the request for designation (RFD) for the Angiotech Antimicrobial Central Venous Catheter (catheter) that you submitted on April 8, 2005. The Office of Combination Products (OCP) filed the RFD on April 8, 2005. We have determined that the product is a combination product, and we have assigned it to the Center for Devices and Radiological Health (CDRH) as the lead agency center for premarket review and regulation based on our determination of the product's primary mode of action (PMOA).

Description of the Product

According to the RFD, the product is comprised of a central venous catheter and an antimetabolite drug, 5-fluorouracil (5-FU), contained in a polymer coating (MEDI-COAT®) applied to the external surfaces of the catheter. [ ] The active ingredient of the polymer coating, 5-FU, is currently an approved drug for intravenous injection, topical solution, and a topical cream. 5-FU is currently an approved drug for the treatment of carcinoma and actinic or solar keratoses of the face. In this product, the antimetabolite mechanism of 5-FU, [ ] leading to inhibition of bacteria growth on the catheter surface and bacterial death.

The RFD states that the product is intended for use in the short-term (<30 day) treatment of diseases or conditions requiring central venous access. The access provided by the catheter allows the administration of nutrient fluids, chemotherapeutic agents, and other drugs for therapy, blood sampling, blood delivery, and venous pressure monitoring. The RFD explains that the drug contained in the

catheter's coating is intended to provide protection against catheter-related infections by inhibiting bacterial growth on the catheter's surface. It not intended for use as a treatment for existing infections.[1]

You recommend that the product be assigned to the Center for Devices and Radiological Health (CDRH) for premarket review and regulation based on its primary mode of action (PMOA).

Product Classification: Combination Product

We have determined that, because your product is comprised of both device (catheter) and drug (5-FU) components, it is a combination product within the meaning of section 503(g) of the Federal Food, Drug, and Cosmetic Act (Act) and Title 21 of the Code of Federal Regulations (CFR) section 3.2(e)(1). In accordance with section 503(g)(1) of the Act and 21 CFR section 3.4, assignment of a lead Center to conduct the review of a combination product is based on the Agency's determination of the product's primary mode of action.

Assignment of Lead Center: CDRH

We have considered the information in the RFD, and discussed the issues with staff in CDRH and CDER.

This product has two modes of action. One action of the product is the action of the device component to provide central venous access for the administration of nutrient fluids, chemotherapeutic agents, and other drugs for therapy, blood sampling, blood delivery, and venous pressure monitoring. Another action of the product is the drug component's action to prevent catheter-related infections by inhibiting bacterial growth on the catheter's surface. We have determined that your product's primary mode of action is attributable to the device component's action of providing central venous access for the administration of nutrient fluids, chemotherapeutic agents, and other drugs for therapy, blood sampling, blood delivery, and venous pressure monitoring. Accordingly, we are assigning the product to CDRH for premarket review and regulation under the medical device provisions of the Act.[2] Assignment of this product to CDRH is also consistent with the guidance provided by the ICA between CDRH and CDER (Sections VII.A.2. and VIII.A.5.).

Any clinical investigations of the combination product are subject to the investigational device exemption (IDE) requirements found at 21 CFR 812 and should be conducted in conformity with those regulations. CDRH will consult with CDER regarding the drug component of your product. FDA recently published a draft guidance document "Current Good Manufacturing Practice for Combination Products, available at http://www.fda.gov/oc/combination/default.htm, which provides information about

[1] The RFD explains that [redacted]
The RFD explains that [redacted]
[redacted]

The catheter is intended to be used only once, and is not intended to be in place for more than 30 days.

[2] We note that this jurisdictional determination applies only to the dose of 5-FU presented in the RFD and the intended use clarified in your email of April 19, 2005. Any change in intended use or dose would require a separate jurisdictional determination.

the applicability of current good manufacturing practice regulations for combination products, and we expect to publish guidance about the applicability of adverse event reporting regulations for combination products. We encourage you to discuss with CDRH these and other regulatory requirements applicable to your combination product.

CDRH's Division of Anesthesiology, General Hospital, Infection Control and Dental Devices (DAGID), General Hospital Devices Branch, will be responsible for the product's premarket review and regulation. For further information about review requirements, please contact Mr. Anthony Watson, Branch Chief, at (301) 594-1287, extension 169. Please include a copy of this letter with your initial submission to CDRH.

You may request reconsideration of the classification or assignment of your product within 15 days of receipt of this letter. If you wish to request reconsideration, or for any other questions about this letter, please contact me at (301) 427-1934. Finally, the Office of Combination Products is available to you as a resource for questions or issues that may arise throughout the development of your product. You may reach us at the above address or by email at combination@fda.gov.

Sincerely,

Leigh Hayes

Leigh Hayes
Product Assignment Officer

cc: Anthony Watson