



October 30, 2019

Jay R. Fajiculay, PharmD
Center for Drug Evaluation and Research
Food and Drug Administration
10903 New Hampshire Avenue
WO31-2417
Silver Spring, MD 20993-0002

RE: Docket No. FDA-2019-N-3936 for “Endocrinologic and Metabolic Drugs Advisory Committee; Notice of Meeting; Establishment of a Public Docket; Request for Comments.”

Dear Mr. Fajiculay:

Aimed Alliance is a 501(c)(3) non-profit organization that seeks to protect and enhance the rights of health care consumers and providers. Thank you for the opportunity to comment on the pending supplemental new drug application (“NDA”) for Vascepa.

The U.S. Food and Drug Administration (“FDA”) should approve Vascepa to reduce the risk of cardiovascular events as an adjunct to statin therapy in adult patients with elevated triglycerides levels. This medication can improve health outcomes and fill an unmet need for patients with or at risk for cardiovascular disease.

I. The Prevalence of Cardiovascular Disease and its Impact on Quality of Life

Cardiovascular disease refers to a range of medical conditions affecting the heart and blood vessels, including heart attack, stroke, heart failure, arrhythmia, and heart valve problems.¹ Major risk factors for cardiovascular disease include high blood pressure, cigarette smoking, obesity, high blood cholesterol levels, and diabetes.² Cardiovascular disease has an enormous prevalence in the United States. It is the leading cause of death for both men and women, with about 850,000 related deaths each year.³ Nearly half of Americans have some form of cardiovascular disease.⁴ According to the Centers for Disease Control and Prevention (“CDC”), about half of Americans have one of the three “key risk factors” for cardiovascular disease: high blood pressure, high cholesterol, or cigarette smoking.⁵

Managing cardiovascular disease can be expensive. It imposes a significant financial burden on patients, their families, caregivers, and the U.S. health system. Direct and indirect costs

¹ [https://www.heart.org/en/health-topics/consumer-healthcare/what-is-cardiovascular-disease;](https://www.heart.org/en/health-topics/consumer-healthcare/what-is-cardiovascular-disease)
<https://www.mayoclinic.org/diseases-conditions/heart-disease/symptoms-causes/syc-20353118>

² <https://www.mayoclinic.org/diseases-conditions/heart-disease/symptoms-causes/syc-20353118>

³ [https://www.cdc.gov/dhbsp/data_statistics/fact_sheets/fs_heart_disease.htm;](https://www.cdc.gov/dhbsp/data_statistics/fact_sheets/fs_heart_disease.htm)
<https://www.ncbi.nlm.nih.gov/pubmed/30700139>

⁴ <https://www.heart.org/en/news/2019/01/31/cardiovascular-diseases-affect-nearly-half-of-american-adults-statistics-show>

⁵ https://www.cdc.gov/heartdisease/risk_factors.htm

of cardiovascular disease are estimated at \$330 billion each year.⁶ These costs include substantial indirect costs for patients and their caregivers, including lost productivity and income.⁷

II. Cardiovascular Disease Treatment and Unmet Need

Cardiovascular disease is often managed through the use of statin therapy, which works by lowering cholesterol levels, such as low-density lipoprotein (“LDL”) levels, in the bloodstream.⁸ Statin therapy has been found to reduce risk for major cardiovascular events and all-cause mortality rates for individuals with and at risk for cardiovascular disease.⁹ Yet, even those patients who are being treated with appropriate statin therapy may still have significant cardiovascular risk.¹⁰

Cardiovascular disease can present in a wide variety of manners and is more likely to occur in the presence of certain, common risk factors.¹¹ For example, elevated triglyceride levels serve as an independent marker for a risk of certain adverse cardiovascular events, such as heart attack and stroke.¹² Thus, many cardiovascular patients also benefit from lowering elevated triglyceride levels.

However, many of the prescription medications currently on the market that treat elevated triglyceride levels may also risk elevating LDL levels, due to the presence of docosahexaenoic acid (“DHA”).¹³ Vascepa is unique because it is an ethyl ester of eicosapentaenoic acid (“EPA”), and does not contain DHA.¹⁴ The REDUCE-IT study found that, while certain medications that reduce triglyceride levels have not been shown to reduce the rates of cardiovascular events when administered in addition to appropriate medical therapy, including statins, Vascepa did reduce that risk.¹⁵ In fact, the risk of major ischemic events, including cardiovascular death, was found to be significantly lower with the addition of two grams of Vascepa twice daily, in addition to statin therapy, than the placebo.¹⁶

⁶ <https://www.mdmag.com/medical-news/heart-break-preventive-aspirin-use-physical-activity-on-the-decline>

⁷ <https://www.ncbi.nlm.nih.gov/pubmed/27831848>

⁸ <https://www.mayoclinic.org/diseases-conditions/arteriosclerosis-atherosclerosis/diagnosis-treatment/drc-20350575>

⁹ [https://www.acc.org/latest-in-cardiology/articles/2016/11/17/09/03/summarizing-the-current-state-and-evidence-on-efficacy-and-safety-of-statin-therapy#targetText=Statin%20therapy%20reduces%20major%20adverse%20cardiovascular%20events%20\(myocardial%20infarctions%2C%20strokes,or%20at%20risk%20for%20ASCVD.&targetText=More%20intense%20statin%20regimens%20yield,compared%20to%20less%20intense%20regimens](https://www.acc.org/latest-in-cardiology/articles/2016/11/17/09/03/summarizing-the-current-state-and-evidence-on-efficacy-and-safety-of-statin-therapy#targetText=Statin%20therapy%20reduces%20major%20adverse%20cardiovascular%20events%20(myocardial%20infarctions%2C%20strokes,or%20at%20risk%20for%20ASCVD.&targetText=More%20intense%20statin%20regimens%20yield,compared%20to%20less%20intense%20regimens).

¹⁰ <https://www.nejm.org/doi/full/10.1056/NEJMoa040583>

¹¹ <https://www.heart.org/en/get-involved/advocate/federal-priorities/access-to-care>;

<https://www.mayoclinic.org/diseases-conditions/heart-disease/symptoms-causes/syc-20353118>

¹² [https://www.mayoclinic.org/diseases-conditions/high-blood-cholesterol/in-depth/triglycerides/art-20048186#targetText=High%20triglycerides%20may%20contribute%20to.of%20the%20pancreas%20\(pancreatitis\);](https://www.mayoclinic.org/diseases-conditions/high-blood-cholesterol/in-depth/triglycerides/art-20048186#targetText=High%20triglycerides%20may%20contribute%20to.of%20the%20pancreas%20(pancreatitis);)

<https://academic.oup.com/eurheartj/article/36/13/774/475534>;

<https://www.ahajournals.org/doi/10.1161/CIRCOUTCOMES.115.002104>;

<https://academic.oup.com/jcem/article/103/8/3019/5005949>;

<https://onlinelibrary.wiley.com/doi/full/10.1111/dom.13537>

¹³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4671468/>

¹⁴ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4671468/>

¹⁵ <https://www.nejm.org/doi/full/10.1056/NEJMoa1812792>

¹⁶ <https://www.nejm.org/doi/full/10.1056/NEJMoa1812792>

Notably, Vascepa is currently the only FDA-approved prescription EPA treatment.¹⁷ As such, its approval serves an unmet need in providing a treatment option that can reduce risk of cardiovascular events associated with two risk factors, without risking elevating LDL levels. Due to the sizeable prevalence of cardiovascular disease in the U.S. and the variety of ways in which it can manifest, access to a variety of therapies is critical for reducing risk of adverse events and mortality rates associated with the disease.

III. Risks Associated with Dietary Supplements

Vascepa provides significant value for cardiovascular patients as an FDA-approved prescription EPA omega-3 fatty acid treatment. Currently, there are many dietary supplements containing omega-3 fatty acids.¹⁸ However, dietary supplements are not intended to treat medical conditions. They are not required to satisfy the rigorous FDA requirements to ensure safety and efficacy before they go to market.¹⁹ For instance, they may not meet good manufacturing standards, lack uniform doses, contain contaminants, or lack the active ingredient.²⁰ As such, dietary supplements can be unreliable, and in some instances, dangerous.²¹ These concerns are particularly troubling for patients with cardiovascular disease, who are relying on their medications to lower their risk of adverse events. An unreliable or ineffective dietary supplement may not work as intended and leave the patient's condition untreated. This can result in disease progression, which, for cardiovascular patients, may result in heart attack or stroke. Consequently, an FDA-approved prescription omega-3 fatty acid product to reduce the risk of cardiovascular events could improve health outcomes for this patient population by providing a consistent, safe, and effective option to lower elevated triglyceride levels.

IV. Conclusion

For the reasons discussed herein, the FDA should approve the supplemental NDA for Vascepa to reduce the risk of cardiovascular events as an adjunct to statin therapy in adult patients with elevated triglycerides levels. Thank you for the opportunity to comment on this issue. If you have any comments or questions, please contact me at policy@aimedalliance.org.

Sincerely,



Taylor Kelly
Policy Advisor

¹⁷ <https://www.vascepa.com/about-vascepa>

¹⁸ <https://ods.od.nih.gov/factsheets/Omega3FattyAcids-Consumer/#targetText=Omega%2D3%20fatty%20acids%20are,%2C%20soybean%2C%20and%20canola%20oils>

¹⁹ <https://www.fda.gov/consumers/consumer-updates/fda-101-dietary-supplements>

²⁰ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4330859/>; <https://www.fda.gov/food/buy-store-serve-safe-food/what-you-need-know-about-dietary-supplements>

²¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4330859/>;
<https://www.consumerreports.org/cro/magazine/2012/09/10-surprising-dangers-of-vitamins-and-supplements/index.htm>