

December 2, 2019

Dear Doctor,

Dechra Veterinary Products is committed to keeping you fully informed on the proper and safe use of OSPHOS® (clodronate injection). Recently, we updated the OSPHOS product label and want to ensure you are aware of the following modifications. We proactively requested to update our materials with FDA to enhance the safe use of this product.

- 1) The following statement has been added under the WARNINGS section of the product insert: NSAIDs should not be used concurrently with OSPHOS. Concurrent use of NSAIDs with OSPHOS may increase the risk of renal toxicity and acute renal failure.
- 2) Horses should be well hydrated prior to and after administration of OSPHOS and renal function should be monitored.
- 3) POST-APPROVAL EXPERIENCE section has been added to the package insert. This is a listing of the potential adverse events in decreasing order of reporting frequency, to include renal failure, polyuria, polydipsia, abdominal pain, anorexia, lethargy, hypercalcemia, behavioral disorder (head shaking, flehmen response, lip licking), discomfort, hyperkalemia, hyperactivity, recumbency, hyperthermia, injection site reactions (pain, edema, inflammation), muscle tremor, urticaria, hyperglycemia, fracture and death.

OSPHOS has an excellent safety profile¹ when used according to label indications and we stand behind the product as a safe and effective option for control of clinical signs associated with navicular syndrome in horses 4 years of age and older.

While it is not always possible to establish a causal relationship to product exposure using adverse event reporting (AER) data, it is important to review and inform horse owners of the additions to the label after a licensed veterinarian has administered OSPHOS. Specifically, owners should be advised to:

- NOT administer NSAIDs
- Ensure horses have access to adequate water before and after administration of OSPHOS
- Observe their horse for at least 2 hours post-treatment for signs of colic, agitation, and/or abdominal behavior
- If a horse appears uncomfortable, nervous or experiences cramping post-treatment, hand walk the horse for 15 minutes. If signs do not resolve, contact the veterinarian.
- Monitor water intake and urine output for 3-5 days post-treatment
- Contact their veterinarian if the horse displays abnormal clinical signs such as changes in drinking and urination, appetite, and attitude.

¹ OSPHOS (clodronate injection) Freedom of Information (FOI) Summary, 2014.
<https://animaldrugatfda.fda.gov/adafda/app/search/public/document/downloadFoi/923>

Dechra Veterinary Products maintains a strong veterinary team who work collaboratively to ensure consistency, quality, and ethical patient care is first and foremost with regards to the use of OSPHOS® (clodronate injection). For 24-hour technical support, to report an adverse reaction, or to obtain a copy of the SDS for OSPHOS contact Dechra Veterinary Products at (866) 933-2472 or support@dechra.com.

Additional information on the FDA-CVM post-approval process is attached for reference, as well as the revised product insert. Please don't hesitate to contact us if you have any questions.

Sincerely,



Jill Stohs, DVM
Director, Pharmacovigilance & Veterinary Services

About Adverse Event Reporting

The FDA's Center for Veterinary Medicine's (CVM) Adverse Event Reporting (AER) system is one of the post-market surveillance tools the FDA uses to monitor the animal and human user safety of animal drugs, as well as the efficacy of these products. In November 2018, the CVM submitted to Dechra Veterinary Products its suggested changes and updates to the OSPHOS® (clodronate injection) package insert based off reports of adverse events (AEs) by either the manufacturer or pet owner.

When looking at the results of adverse event reports (AERs) for any product, the FDA advises "be aware that there is no certainty that the reported drug or device caused the adverse event. While a suspected relationship may exist, it is not established and should not be the sole source of information for clinical decision-making or other assumptions about the safety or effectiveness of a product. The adverse event may have been related to an underlying disease, other drugs used at the same time or other non-drug related sources. In addition, it is important to remember that AERs represent a small percentage of total usage numbers of a product."²

For additional information about adverse drug experience reporting for animal drugs, contact FDA at 1-888-FDA-VETS or <http://www.fda.gov/AnimalVeterinary/SafetyHealth>

² <https://www.fda.gov/animal-veterinary/product-safety-information/adverse-event-reports-animal-drugs-and-devices>

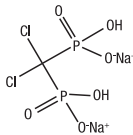
OSPPOS® (clodronate injection)

Bisphosphonate

CAUTION: Federal law (USA) restricts this drug to use by or on the order of a licensed veterinarian. For intramuscular use in horses only.

DESCRIPTION: Clodronate disodium is a non-amino, chloro-containing bisphosphonate. Chemically, clodronate disodium is (dichloromethylene) diphosphonic acid disodium salt and is manufactured from the tetrahydrate form.

The structural formula of clodronate disodium is:



Molecular Formula: $\text{C}_2\text{H}_2\text{Cl}_2\text{Na}_2\text{O}_6\text{P}_2$ Molecular Weight: 288.85

Active substance clodronate disodium tetrahydrate 74.98 mg/mL corresponds to clodronate disodium 60.0 mg/mL. Each mL contains 60 mg clodronate disodium, sodium hydroxide (to adjust pH) and water for injection.

INDICATION: For the control of clinical signs associated with navicular syndrome in horses.

DOSE AND ADMINISTRATION: Administer 1.8 mg/kg by intramuscular injection up to a maximum dose of 900 mg per horse. Divide the total volume evenly into three separate injection sites. Discard unused vial contents. OSPPOS is provided in a single use vial and does not contain a preservative.

Clinical improvement is most evident at 2 months post-treatment (see **EFFECTIVENESS**). Of the horses that responded to treatment with OSPPOS in the field study, 65% maintained their level of improvement through the 6 month evaluation.

If there is no response to initial therapy, the horse should be re-evaluated. For horses that initially respond to OSPPOS but do not maintain their clinical improvement for 6 months, OSPPOS may be re-administered at 3 to 6 month intervals based on recurrence of clinical signs. For horses that respond to OSPPOS and maintain clinical improvement for 6 months, OSPPOS should be re-administered after clinical signs recur.

CONTRAINDICATIONS: Horses with hypersensitivity to clodronate disodium should not receive OSPPOS.

Do not use in horses with impaired renal function or with a history of renal disease.

WARNINGS: Do not use in horses intended for human consumption.

NSAIDs should not be used concurrently with OSPPOS. Concurrent use of NSAIDs with OSPPOS may increase the risk of renal toxicity and acute renal failure.

Human Warnings: Not for human use. Keep this and all drugs out of the reach of children. Consult a physician in case of accidental human exposure.

PRECAUTIONS: OSPPOS has been associated with renal toxicity. Concurrent administration of other potentially nephrotoxic drugs should be approached with caution and renal function should be monitored. Use of bisphosphonates in patients with conditions or diseases affecting renal function is not recommended.

Horses should be well-hydrated prior to and after the administration of OSPPOS due to the potential for adverse renal events. Water intake and urine output should be monitored for 3-5 days post-treatment and any changes from baseline should elicit further evaluation.

As a class, bisphosphonates may be associated with gastrointestinal and renal toxicity. Sensitivity to drug associated adverse reactions varies with the individual patient. Renal and gastrointestinal adverse reactions may be associated with plasma concentrations of the drug. Bisphosphonates are excreted by the kidney; therefore, conditions causing renal impairment may increase plasma bisphosphonate concentrations resulting in an increased risk for adverse reactions.

Administration of bisphosphonates has been associated with abdominal pain (colic), discomfort, and agitation in horses. Clinical signs usually occur shortly after drug administration and may be associated with alterations in intestinal motility. In horses treated with OSPPOS these clinical signs usually began within 2 hours of treatment. Horses should be monitored for at least 2 hours following administration of OSPPOS.

Bisphosphonates affect plasma concentrations of some minerals and electrolytes such as calcium, magnesium and potassium, immediately post-treatment, with effects lasting up to several hours. Caution should be used when administering bisphosphonates to horses with conditions affecting mineral or electrolyte homeostasis (e.g. hyperkalemic periodic paralysis, hypocalcemia, etc.).

The safe use of OSPPOS has not been evaluated in horses less than 4 years of age. The effect of bisphosphonates on the skeleton of growing horses has not been studied; however, bisphosphonates inhibit osteoclast activity which impacts bone turnover and may affect bone growth.

Bisphosphonates should not be used in pregnant or lactating mares, or mares intended for breeding. The safe use of OSPPOS has not been evaluated in breeding horses or pregnant or lactating mares. Bisphosphonates are incorporated into the bone matrix, from where they are gradually released over periods of months to years. The extent of bisphosphonate incorporation into adult bone, and hence, the amount available for release back into the systemic circulation, is directly related to the total dose and duration of bisphosphonate use. Bisphosphonates have been shown to cause fetal developmental abnormalities in laboratory animals. The uptake of bisphosphonates into fetal bone may be greater than into maternal bone creating a possible risk for skeletal or other abnormalities in the fetus. Many drugs, including bisphosphonates, may be excreted in milk and may be absorbed by nursing animals.

Increased bone fragility has been observed in animals treated with bisphosphonates at high doses or for long periods of time. Bisphosphonates inhibit bone resorption and decrease bone turnover which may lead to an inability to repair microdamage within the bone. In humans, atypical femur fractures have been reported in patients on long term bisphosphonate therapy; however, a causal relationship has not been established.

ADVERSE REACTIONS: One hundred forty-six horses (111 OSPPOS, 35 saline control) of various breeds, 4 to 22 years of age, and weighing 807 to 1,322 pounds were included in the field study safety analysis.

Following treatment on Day 0, 10 horses had clinical signs of discomfort or nervousness, cramping, pawing, and/or colic within 2 hours post-treatment. One horse experienced colic and hives required treatment with supportive care to resolve clinical signs. In 8 of the 10 horses, 10 to 15 minutes of hand walking resulted in resolution of clinical signs. In one horse, clinical signs resolved without hand walking. Three additional horses experienced lip licking, yawning, and/or head shaking. Adverse reactions occurring within 2 hours post-treatment with OSPPOS or the saline control are summarized in Table 1.

Table 1: Adverse Reactions Occurring within 2 Hours Post-treatment

Clinical Sign	OSPPOS (n=111)	Control (n=35)
Uncomfortable, Nervous, Colic, and/or Pawing	9.0% (10)	0% (0)
Lip licking	5.4% (6)	0% (0)
Yawning	4.5% (5)	0% (0)
Head shaking	2.7% (3)	0% (0)
Injection site swelling	1.8% (2)	2.9% (1)
Colic requiring treatment*	0.9% (1)	0% (0)
Hives/Pruritus	0.9% (1)	0% (0)

* This horse experienced colic and hives and recovered with supportive treatment.

POST-APPROVAL EXPERIENCE (December 2018): The following adverse events are based on post-approval adverse drug experience reporting. Not all adverse events are reported to FDA/CVMA. It is not always possible to reliably estimate the adverse event frequency or establish a causal relationship to product exposure using these data.

The following adverse events are listed in decreasing order of reporting frequency: renal failure, polyuria, polydipsia, abdominal pain, anorexia, lethargy, hypercalcemia, behavioral disorder (e.g.: head shaking, flehmen response, lip licking), discomfort, hyperkalemia, hyperactivity, recumbency, hyperthermia, injection site reactions (pain, edema, inflammation), muscle tremor, urticaria, hyperglycemia, and fracture.

In some cases, death has been reported as an outcome of the adverse events listed above (See **PRECAUTIONS**).

Contact Information: For a copy of the SDS or to report suspected adverse drug events, contact Dechra at (866) 933-2472. For additional information about adverse drug experience reporting for animal drugs, contact FDA at 1-888-FDA-VETS or online at <http://www.fda.gov/AnimalVeterinary/SafetyHealth>.

INFORMATION FOR HORSE OWNERS: Owners should be advised to:

- NOT administer NSAIDs.
- Ensure horses have access to adequate water before and after administration of OSPPOS.
- Observe their horse for at least 2 hours post-treatment for signs of colic, agitation, and/or abnormal behavior.
- If a horse appears uncomfortable, nervous, or experiences cramping post-treatment, hand walk the horse for 15 minutes. If signs do not resolve contact the veterinarian.
- Monitor water intake and urine output for 3-5 days post-treatment.
- Contact their veterinarian if the horse displays abnormal clinical signs such as changes in drinking and urination, appetite, and attitude.

(See **PRECAUTIONS** and **Post-Approval Experience** sections.)

CLINICAL PHARMACOLOGY: Clodronate disodium is a non-nitrogen containing bisphosphonate that inhibits bone resorption by binding to calcium phosphate crystals (inhibiting their formation and dissolution), and by exerting direct cellular effects on osteoclasts (inhibiting osteoclast cell function). Bound to bone matrix, clodronate disodium enters resorbing osteoclasts, alters their morphology and reduces the number of active osteoclasts, regardless of the cause of osteoclast activity.^{2,3}

In humans, 60 to 80% of clodronate disodium administered intravenously is eliminated unchanged in the urine and 5% in feces²; the remainder of the administered dose is distributed to bone. The bone residence time in horses could not be estimated. However, in numerous studies, the half-life of clodronate disodium in rodent bone (long bones and lumbar vertebrae) has been estimated to be months to years.

After intramuscular injection, clodronate disodium is rapidly absorbed and cleared from the plasma. Within a dosing range of 1.8 to 5.4 mg/kg (n=8 per dose group), the C_{max} values increased in proportion to the dose. However, dose related changes were observed after the third administration of a regimen consisting of a single 5.4 mg/kg intramuscular injection administered once every 28 days. In this 3X

dose group, a decrease in apparent total systemic clearance (CL/F) was seen (0.08 mL/hr + 0.02; mean + standard deviation), resulting in a greater than proportional increase in systemic drug exposure (AUC, 62.49 hr*mcg/mL + 18.52) and plasma elimination $T_{1/2}$ (2.89 hours + 1.33). In comparison, the estimated mean CL/F in horses receiving the 1X (1.8 mg/kg) dose was 0.12 mL/hr + 0.02 (mean + standard deviation) and the corresponding mean pharmacokinetic parameters were 5.36 ± 0.98 mcg/mL (C_{max}), 12.15 ± 1.83 hr*mcg/mL (AUC), 1.65 ± 0.52 hours ($T_{1/2}$) and 20 minutes (T_{max}).

EFFECTIVENESS: A double masked 3:1 randomized, negative control, multi-site field study evaluated the effectiveness of a single dose of 1.4 mg/kg OSPPOS (maximum dose of 900 mg/horse) for the control of clinical signs associated with navicular syndrome in horses. Enrolled horses had a unilateral or bilateral forelimb lameness of Grade ≥ 2 on the AAEP lameness scale (Grade 0 to 5) and a diagnosis of navicular syndrome based on lameness exam, diagnostic nerve blocks, and radiographic signs indicative of the bony changes associated with navicular syndrome. Horses with radiographic signs indicating concurrent soft tissue injury, osteoarthritis, fractures, or any condition other than the bony changes related to navicular syndrome were not eligible for enrollment. A horse was considered a treatment success if the lameness grade in the primarily affected limb improved by at least 1 AAEP grade and there was no worsening of lameness grade in the other forelimb on Day 56 post-treatment as compared to the pre-treatment assessment. Lameness scores were also recorded on Day 28 and Day 180.

Of the 111 horses screened for enrollment, 146 horses received treatment (111 OSPPOS and 35 saline control). 29% of horses screened for enrollment were not eligible based on radiographic findings. 114 horses (86 OSPPOS, 28 saline control) were included in the statistical analysis. Effectiveness was evaluated on Day 56 post-treatment. On Day 56, 68 of the 86 OSPPOS treated horses and 1 out of 28 saline treated horses were treatment successes. Based on the statistical analysis, the estimated least squares mean success rates are 74.7% and 3.3% for the OSPPOS and saline treatment groups, respectively. The difference in success rates is significant at $P=0.0028$.

Table 2: Day 56 Treatment Success Rate

Study Day	OSPPOS	Saline	P Value*
56	74.7%	3.3%	0.0028

* P value and estimated success rates are based on back-transformed mean estimates from the statistical analysis.

Treatment success based on Day 28 and Day 180 lameness scores was also assessed but not statistically analyzed. At Day 28, 67.4% (60/89) OSPPOS treated horses were considered successes, compared to 20.7% (6/29) in the saline treated group. Day 56 treatment successes were followed to the Day 180 assessment, and Day 56 treatment failures were also considered failures at Day 180. Of the 68 OSPPOS treated horses that were deemed treatment successes on Day 56, 60 were evaluable at Day 180. Of these 60 horses, 51 remained treatment successes at Day 180 based on improvement in lameness grade as compared to Day 0. However, 21 of these 60 evaluable horses demonstrated a Day 180 lameness grade at Day 180 as compared to their Day 56 evaluation. Including the 18 treatment failures at Day 56, the estimated overall success rate for OSPPOS at Day 180 is 65.4% (51/78).

Table 3: Day 28 and Day 180 Treatment Success Rates

Study Day	OSPPOS	Saline
28	67.4% (60/89)	20.7% (6/29)
180	65.4% (51/78)*	None evaluable

* The 18 horses that were treatment failures on Day 56 were considered to remain treatment failures at Day 180. No Day 180 lameness evaluation was performed on these horses. 60 horses (all OSPPOS treated horses) completed the Day 180 lameness evaluation.

ANIMAL SAFETY: Two studies were conducted to assess the safety of OSPPOS in horses, a six month target animal safety (TAS) study and a two phase study evaluating the safety of concurrent use of the recommended dose of OSPPOS with an NSAID and a single 5X (9 mg/kg) dose of OSPPOS.

Target Animal Safety Study: In the TAS study, OSPPOS was administered to 32 healthy adult horses at 0, 1.8, 3.6 and 5.4 mg/kg (0, 1, 2, and 3X the recommended dose) every 28 days for 6 consecutive months. OSPPOS was administered by intramuscular injection with the total volume divided evenly into at least three separate injection sites with a maximum of 15 mL per injection site.

In the TAS study, the most common post-treatment observations were clinical signs related to abdominal discomfort (colic) and the central nervous system. The incidence of colic was dose related. In the TAS study, colic was observed following 94% (45/48) of 3X treatment administrations, 54% (26/48) of 2X treatment administrations, 4% (2/48) of 1X treatment administrations, and 8% (4/48) of 0X treatment administrations. 80% (36/45) of the 3X horses, 31% (8/26) of 2X horses and none of the 1X (0/2) and 0X (0/4) horses required hand walking to relieve clinical signs associated with colic. In the 3X group, clinical signs of colic often persisted after hand walking and horses were often walked more than once. Colic related clinical signs began shortly after administration (ranging from 1 to 227 minutes post-treatment). No horses in any treatment group received medical treatment and all horses returned to normal within 5.5 hours post-treatment.

In the TAS study, post-treatment clinical signs also included yawning, flehmen, tongue rolling, head shaking and neck writhing. The signs were observed in 50% (4/8) of 0X, 100% (8/8) of 1X, 88% (7/8) of 2X, and 100% (8/8) of 3X horses. All horses returned to normal within 5.5 hours post-treatment.

Table 4: Incidence of Abnormal Clinical Signs in the TAS Study

Clinical Sign	Number of Observations per Treatment Group (N=48 treatment administrations per group)			
	0X	1X	2X	3X
Colic*	4	2	26	45
Colic requiring hand walking	0	0	8	36
Yawning	5	17	16	30
Flehmen	0	0	8	2
Tongue rolling	1	10	8	10
Head shaking	0	5	3	7
Neck writhing	0	0	0	6
Pawing	4	4	12	23
Agitation	1	1	7	10
Depression	0	2	5	21
Muscle fasciculations/Trembling	0	0	1	4

* Signs of colic included repeated lying down and rising, rolling, kicking at the abdomen, stretching of the abdomen and/or other typical signs of abdominal discomfort.

Injection site reactions were identified in three 0X, four 1X, two 2X, and one 3X horse. One 1X horse had injection site reactions on two separate treatment days. Injection site reactions in OSPPOS treated horses were characterized by soft or firm swelling, ranging in size from 0.5 cm diameter to 1 x 28 cm, and resolved within 10 days. Clinical pathology evaluations showed a dose related trend for increases in BUN and creatinine post-treatment with the 2X and 3X dose groups having statistically significant elevations as compared to the 0X dose group. Horses in all OSPPOS treated groups had dose dependent elevations in BUN concentrations above the reference range (up to 41 mg/dL; reference range 8-25 mg/dL). Three 3X horses had creatinine concentrations above the reference range (up to 2.5 mg/dL; reference range 0.9-1.9 mg/dL) for up to 12 hours post-treatment. A dose related trend for an increase in potassium was observed for up to 6 hours post-treatment. Individual animal potassium concentrations were within the reference range with the exception of two 3X horses with post-treatment potassium concentrations up to 5.3 mg/dL (reference range 3-5 mg/dL). Decreases in chloride and increases in glucose, creatine kinase, and aspartate aminotransferase were also observed post-treatment. End of study evaluations concluded that bone density (bone mineral concentration) and bone strength (mechanical testing of cortical bone) remained similar between all dose groups.

Two Phase Pilot Study: In Phase I of a two phase pilot study, six horses were administered phenylbutazone orally twice a day at a dose of 4.4 mg/kg on Days 0 to 3, administered OSPPOS at 1.8 mg/kg (1X) by intramuscular injection into 3 sites once on Day 4, and continued on phenylbutazone orally twice a day at a dose of 2.2 mg/kg on Days 4 to 6. In Phase II of the pilot study, after a 15 day washout, the same six horses were administered a single dose of OSPPOS at 9 mg/kg (5X) by intramuscular injection divided evenly into 5 separate injection sites. No NSAIDs were administered in Phase II.

In Phase I, three horses had post-treatment elevations in BUN above the reference range (up to 42 mg/dL; reference range 8-25 mg/dL). BUN concentrations returned to normal prior to Phase II of the study. In Phase II, five out of six horses developed changes in attitude associated with signs of agitation or nervousness including pawing, circling, and tail twitching within 6 minutes of dosing. Four of six horses also developed clinical signs including excessive yawning, flehmen, tongue rolling, head shaking, and head bobbing. All six horses developed mild to moderate muscle fasciculations between 2 and 30 minutes post-treatment. By 30 minutes post-treatment, four out of six horses also developed signs of discomfort and possible abdominal pain including full body stretching, repetitive lying down and rising, and kicking at the abdomen. At approximately one hour post-treatment, one horse exhibited agitation and clinical signs of colic requiring medical therapy. The horse responded to medical therapy and was clinically normal at 7 hours post-treatment. Three out of six horses developed mild gait abnormalities that included mild to moderate hypermetria, spasticity, or mild ataxia. Four out of six horses developed temporarily elevated BUN concentrations by 48 hours post-treatment and one horse had a creatinine concentration slightly above the reference range (2.0 mg/dL; reference range 0.9-1.9 mg/dL) for 12 hours post-treatment.

STORAGE INFORMATION: Store at controlled room temperature 25°C (77°F) with excursions between 15°C-30°C (59°F-86°F) permitted. Single use vial; discard unused portion.

HOW SUPPLIED: OSPPOS is supplied in cartons with each carton containing one clear glass 20 mL vial with 15 mL (900 mg) clodronate disodium (60 mg/mL) per vial. NDC 17033-460-15

MANUFACTURED FOR: Dechra Veterinary Products, 7015 College Boulevard, Suite 525, Overland Park, KS 66211 USA. For a copy of the Safety Data Sheet (SDS) or to report adverse reactions call Dechra Veterinary Products at (866) 933-2472. Manufactured in Canada. US Patent 7,781,420. OSPPOS is a registered trademark of Dechra Ltd. All rights reserved. © 2018 Dechra Ltd.

¹ Fleisch H. 1987. Bisphosphonates—history and experimental basis. Bone 8: S23-28.

² Plosker GL, Goa KL. 1994. Clodronate. A review of its pharmacological properties and therapeutic efficacy in resorptive bone disease. Drugs 47: 945-982.

³ Flanagan AM, Chambers TJ. 1989. Dichloromethylene bisphosphonate (Cl2MBP) inhibits bone resorption through injury to osteoclasts that resorb Cl2MBP-coated bone. Bone Miner. 6:33-43.

Approved by FDA under NADA # 141-427

TAKE
TIME
OBSERVE LABEL
DIRECTIONS

Rev. December 2018

