

Discussion of the Food and Drug Administration's Position with
Respect to Certain Combinations of Antibiotic Drugs

Under the Federal Food, Drug, and Cosmetic Act enacted in 1938, safety was the sole consideration for obtaining approval to market a new drug. The Drug Amendments of 1962 extended the requirements to include substantial evidence of effectiveness.

The Amendments also prescribed the criteria to be used in determining that a drug is effective. As defined therein, "the term 'substantial evidence' means evidence consisting of adequate and well-controlled investigations, including clinical investigations, by experts qualified by scientific training and experience to evaluate the effectiveness of the drug involved, on the basis of which it could fairly and responsibly be concluded by such experts that the drug will have the effect it purports or is represented to have under the conditions of use prescribed, recommended, or suggested in the labeling or proposed labeling thereof."

These Amendments also conferred upon the Food and Drug Administration the responsibility to review the decisions made on the many hundreds of new drugs introduced to the market from 1938 to 1962, which had previously been approved only on the basis of evidence of safety, and to determine whether there is substantial evidence of effectiveness for each purpose for which they are labeled. It was also deemed necessary to re-examine all antibiotic drug products cleared for marketing between 1938 and 1962 and to apply to them the same criteria for substantial evidence of effectiveness.

The Food and Drug Administration did not have sufficient medical manpower to carry out the efficacy review by itself. The Agency needed the help of the broader scientific community and a means of bringing to this assignment the nation's best scientific and medical knowledge. The Food and Drug Administration sought out the assistance of the National Academy of Sciences-National Research Council in order to carry out the efficacy study.

In conducting these reviews the Academy had access to all information with respect to these drugs which the drug sponsors submitted in an effort to establish the effectiveness of their drugs; in addition to the submitted material, the Academy was privileged to use all the information concerning the product under review that appears in the scientific literature.

It is important to note that the Federal Register announcement, published December 24, 1968, on the combination drugs, which has been referred to in the public press, was directed only to the fixed combinations of the specific antibiotics mentioned.