

James C. McGraw, D.D.S.
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American Association of Endodontists
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Dear Dr. McGraw:

This is in response to your letter of March 29, 1991 concerning the safety of the dental drug Sargenti Paste, Sargenti Compound, or N2.

We have repeatedly advised proponents of this drug that the N2 material is considered to be an unapproved new drug. Further, it may not legally be imported or distributed in interstate commerce until an applicant has submitted a new drug application (NDA) with convincing evidence of safety and effectiveness for the recommended use, and FDA has approved the application.

We have, over the years, been very concerned about the compounding of Sargenti containing levels of heavy metals. Because of that concern, the agency issued a letter to all State drug officials in April 1974, advising them that we regarded the N2 preparations to be unapproved new drugs. The issuance of that letter represented a major step on the part of FDA. We defined a policy that Sargenti Paste, with heavy metals, is too toxic for use.

Subsequent to our 1974 letter, FDA convened a Product Advisory Committee on the safety and safe use of these products. The Committee concluded that there was insufficient valid scientific evidence to permit a judgement that these preparations are generally recognized as safe and effective. FDA then reaffirmed its policy that although the Committee also found insufficient evidence of significant risk from the proper use of these products, commercial marketing in interstate commerce is in violation of the new drug provision of the Food, Drug and Cosmetic Act.

Accordingly, FDA still believes that all commercial marketing of these products would require an approved new drug application. The safety questions of both active ingredients and excipients are evaluated during FDA review of the new drug approval applications.

We have allowed quantities of N2 (Sargenti) Paste which do not contain heavy metals to be distributed for single patients in conformance with the practice of pharmacy. The maximum amount of the non-heavy metal formulation which we permit to be dispensed under the practice of pharmacy is 5 gm. Bulk shipments by pharmacists to dentists are not permitted.

We have the following comments regarding the use of paraformaldehyde at concentrations of 5.5 percent in these preparations. It is our understanding that paraformaldehyde (formaldehyde) has been used for years in dental products. One of the accepted preparations is Buckley's Formo Cresol, which contains 19 percent formaldehyde (page 329, Accepted Dental Therapeutics, 40th Edition). We have not objected to its inclusion in these products. We also understand that these products are ordinarily not sealed within a root canal, and might therefore be expected to have less toxicity.

We continue to regard N2 (Sargenti) Paste as a new drug requiring an approved new drug application as a condition for marketing outside the practice of pharmacy.

We have forwarded all of the information that you provided to the FDA medical reviewers most knowledgeable about these products. We appreciate your providing us with the information.

Sincerely yours,

David A. Kessler, M.D.
Commissioner
Food and Drug Administration