

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

75279

CHEMISTRY REVIEW(S)

OFFICE OF GENERIC DRUGS

ABBREVIATED NEW DRUG APPLICATION CHEMISTRY, MANUFACTURING AND CONTROLS REVIEW

1. CHEMIST'S REVIEW NUMBER

3

2. ANDA NUMBER

75-279

3. NAME AND ADDRESS OF APPLICANT

Taro Pharmaceuticals USA, Inc.
Attention: Lorraine Sachs, RAC
5 Skyline Drive
Hawthorne, NY 10532

4. LEGAL BASIS for ANDA SUBMISSION

The listed reference product is TEMOVATE® Gel, 0.05% manufacturing by Glaxo Wellcome. TEMOVATE® is no covered by any patents and exclusivity provisions.

5. SUPPLEMENT(s)

None.

6. NAME OF DRUG

Clobetasol Propionate Gel

7. NONPROPRIETARY NAME

Clobetasol Propionate Gel

8. SUPPLEMENT(s) PROVIDE(s) FOR

None.

9. AMENDMENTS AND OTHER DATES

12/19/1997	Original submission
2/3/1998	Amendment
3/31/1998	Amendment
8/21/1998	Major amendment
2/15/1999	Fax amendment
2/25/1999	Telephone amendment
3/29/1999	Telephone amendment
5/5/1999	Telephone amendment
5/11/1999	Telephone amendment
5/26/1999	Telephone amendments (two pieces)

10. PHARMACOLOGICAL CATEGORY

Anti-inflammatory

11. HOW DISPENSED
Prescription

12. RELATED IND/NDA/DMF(s)

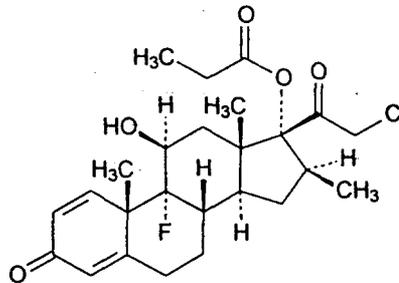
Product	Holder	DMF No.	LOA
Clobetasol Propionate USP			v1.3, p875
Tube and cap			v1.3, p1032
Lacquer,			v1.3, p1055
Crimp sealant			v1.3, p1058
Resin,			v1.3, p1062
Colorant,			v1.3, p1066
Tube and cap			v1.3, p1096
Resin			v1.3, p1142
			v2.1, p4

13. DOSAGE FORM
Gel

14. POTENCY
0.05%

15. CHEMICAL NAME AND STRUCTURE

Clobetasol Propionate. Pregna-1,4-diene-3,20-dione, 21-chloro-9-fluoro-11-hydroxy-16-methyl-17-(1-oxopropoxy)-, (11 β ,16 β)-. C₂₅H₃₂ClFO₅. 466.99. 25122-46-7.



16. RECORDS AND REPORTS
None.

17. COMMENTS
None.

18. CONCLUSIONS AND RECOMMENDATIONS
The application is approvable.

19. REVIEWER AND DATE COMPLETED
Naiqi Ya/May 27, 1999

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Chem # 3

OFFICE OF GENERIC DRUGS

ABBREVIATED NEW DRUG APPLICATION CHEMISTRY, MANUFACTURING AND CONTROLS REVIEW

1. CHEMIST'S REVIEW NUMBER

2 (TWO)

2. ANDA NUMBER

75-279

3. NAME AND ADDRESS OF APPLICANT

Taro Pharmaceuticals USA, Inc.
Attention: Lorraine Sachs, RAC
5 Skyline Drive
Hawthorne, NY 10532

4. LEGAL BASIS for ANDA SUBMISSION

The listed reference product is TEMOVATE® Gel, 0.05% manufacturing by Glaxo Wellcome. TEMOVATE® is no covered by any patents and exclusivity provisions.

5. SUPPLEMENT(s)

None

6. NAME OF DRUG

Clobetasol Propionate Gel

7. NONPROPRIETARY NAME

Clobetasol Propionate Gel

8. SUPPLEMENT(s) PROVIDE(s) FOR

None

9. AMENDMENTS AND OTHER DATES

12/19/97	Original submission
2/3/98	Amendment
3/31/98	Amendment
8/21/98	Major amendment

10. PHARMACOLOGICAL CATEGORY

Anti-inflammatory

11. HOW DISPENSED

Prescription (R)

12. RELATED DMF(s)

Product	Holder	DMF(type)	LOA letter
▶ Clobetasol Propionate USP			v1.3, p875

Product	Holder	DMF(type)	LOA letter
▸ Tube and cap			v1.3, p1032
▸ Lacquer,			v1.3, p1055
▸ Crimp sealant			v1.3, p1058
▸ Resin,			v1.3, p1062
▸ Colorant,			v1.3, p1066
▸ Tube and cap			v1.3, p1096
▸ Resin.			v1.3, p1142
			v2.1, p4

13. DOSAGE FORM

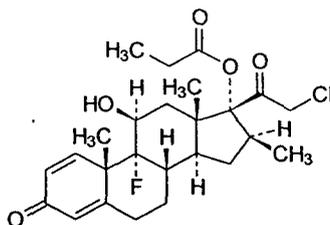
Gel

14. POTENCY

0.05%

15. CHEMICAL NAME AND STRUCTURE

Clobetasol Propionate. Pregna-1,4-diene-3,20-dione, 21-chloro-9-fluoro-11-hydroxy-16-methyl-17-(1-oxopropoxy)-, (11 β ,16 β)-. C₂₅H₃₂ClFO₅. 466.99. 25122-46-7.

**16. RECORDS AND REPORTS**

None

17. COMMENTS

The following sections are not satisfactory:

- 28. Laboratory controls
- 29. Stability

The following section is pending:

- 31. Samples and results
- 32. Labeling

18. CONCLUSIONS AND RECOMMENDATIONS

The application is not approvable. A NA facsimile will issue.

19. REVIEWER AND DATE COMPLETED

Naiqi Ya, Ph.D./December 21, 1998

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Chem # 2

OFFICE OF GENERIC DRUGS

ABBREVIATED NEW DRUG APPLICATION CHEMISTRY, MANUFACTURING AND CONTROLS REVIEW

1. CHEMIST'S REVIEW NUMBER
1 (ONE)

2. ANDA NUMBER
75-279

3. NAME AND ADDRESS OF APPLICANT
Taro Pharmaceuticals USA, Inc.
Attention: Lorraine Sachs, RAC
5 Skyline Drive
Hawthorne, NY 10532

4. LEGAL BASIS for ANDA SUBMISSION
The listed reference product is TEMOVATE® Gel, 0.05% manufacturing by Glaxo Wellcome.
TEMOVATE® is not covered by any patents and exclusivity provisions.

5. SUPPLEMENT(s)
None

6. NAME OF DRUG
Clobetasol Propionate Gel

7. NONPROPRIETARY NAME
Clobetasol Propionate Gel

8. SUPPLEMENT(s) PROVIDE(s) FOR
None

9. AMENDMENTS AND OTHER DATES
12/19/97 Original submission
2/3/98 Amendment
3/31/98 Amendment

10. PHARMACOLOGICAL CATEGORY
Anti-inflammatory

11. HOW DISPENSED
Prescription (R)

12. RELATED DMF(s)

Product	Holder	DMF(type)	LOA letter
▶ Clobetasol Propionate USP			v1.3, p875
▶ Tube and cap			v1.3, p1032

Product	Holder	DMF(type)	LOA letter
▶ Lacquer,			v1.3, p1055
▶ Crimp sealant			v1.3, p1058
▶ Resin.			v1.3, p1062
▶ Colorant,			v1.3, p1066
▶ Tube and cap			v1.3, p1096
▶ Resin,			v1.3, p1142

13. DOSAGE FORM

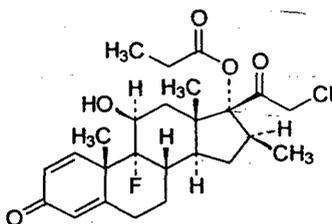
Gel

14. POTENCY

0.05%

15. CHEMICAL NAME AND STRUCTURE

Clobetasol Propionate. Pregna-1,4-diene-3,20-dione, 21-chloro-9-fluoro-11-hydroxy-16-methyl-17-(1-oxopropoxy)-, (11 β ,16 β)-. C₂₅H₃₂ClFO₅. 466.99. 25122-46-7.

**16. RECORDS AND REPORTS**

None

17. COMMENTS

The following sections are not satisfactory:

- 23. Raw material
- 25. Manufacturing and processing
- 26. Container
- 28. Laboratory controls
- 29. Stability
- 32. Labeling

The following section is pending:

- 31. Samples and results

18. CONCLUSIONS AND RECOMMENDATIONS

The application is not approvable. A NA major letter will issue.

19. REVIEWER AND DATE COMPLETED

Naiqi Ya, Ph.D./May 13, 1998

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Chem # 1

ANDA APPROVAL SUMMARY

ANDA: 75-279	CHEMIST: Naiqi Ya	DATE: May 27, 1999
DRUG PRODUCT: Clobetasol Propionate Gel, 0.05%		
FIRM: Taro Pharmaceuticals USA, Inc.		
DOSAGE FORM: Gel	STRENGTH: 0.05%	
cGMP: EER was found acceptable for all the establishments on January 26, 1999.		
BIO: Reviewed by Moo Park and found satisfactory on April 27, 1998.		
VALIDATION (Description of dosage form same as firm's): The method validation was done by _____ on April 7, 1999 and found the applicant's method is suitable for regulatory analysis of this product.		
STABILITY: The containers in the stability studies are identical to those in the container section.		
LABELING: Container, carton, and insert labeling were approved by Lillie Golson on January 22, 1999.		
STERILIZATION VALIDATION (If applicable): Not applicable.		
SIZE OF BIO BATCH (Firm's source of NDS ok?): The bio batch (S118-5994) size is _____ kg.		
SIZE OF STABILITY BATCHES (If different from bio batch, were they Manufactured via the same process?): Same as the bio batch.		
PROPOSED PRODUCTION BATCH MANUFACTURING PROCESS THE SAME? The proposed production batches is _____ kg. The manufacturing processes are identical, except the vessel size changes in the certain steps.		
Signature of chemist: IS/ 5/27/99		Signature of supervisor: PS 5/27/99

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FEB 11 1999

38. CHEMISTRY COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: 75-279

APPLICANT: Taro Pharmaceuticals Inc.

DRUG PRODUCT: Clobetasol Propionate Gel, 0.05%

The deficiencies presented below represent FACSIMILE deficiencies.

A. Deficiencies:

B. In addition to responding to the deficiencies presented above, please note and acknowledge the following comment in your response:

1. Upon the resolution of the deficiencies of method validations indicated above, the assay methods for finished product will need to be validated by a FDA laboratory.

2. A satisfactory compliance evaluation of the facilities listed for drug substance and drug product manufacturing and quality control in the applications is necessary at the time of the approval of the application.

Sincerely yours,

/S/

Rashmikant M. Patel, Ph.D.
Director
Division of Chemistry I
Office of Generic Drugs
Center for Drug Evaluation and Research