CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER: 21-084

APPROVAL LETTER

NDA 21-084

Major General John Parker
Commanding General
U.S. Army Medical Research and Materiel Command
504 Scott Street
Fort Detrick, MD 21702-5012

Dear General Parker:

Please refer to your new drug application (NDA) 21-084, dated August 18, 1999, received August 19, 1999, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Skin Exposure Reduction Paste Against Chemical Warfare Agents (SERPACWA).

We acknowledge receipt of your submissions dated September 2 (2) and 24 (2), October 18, 19, 26 and 27, November 19 and 23, December 3 and 9, 1999, and January 26, and February 1, 8, 11, 16 (3 facsimiles) and 17, 2000 (2 facsimiles).

This new drug application provides for the use of Skin Exposure Reduction Paste Against Chemical Warfare Agents (SERPACWA) only in conjunction with Mission Oriented Protective Posture (MOPP) gear to reduce or delay the absorption of chemical warfare agents through the skin when SERPACWA is applied prior to exposure.

We have completed the review of this application, as amended, and have concluded that adequate information has been presented to demonstrate that the drug product is safe and effective for use as recommended in the agreed upon enclosed labeling text. Accordingly, the application is approved effective on the date of this letter.

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert, immediate container and carton labels). Distributing the product with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

Please submit 20 copies of the FPL as soon as it is available, in no case more than 30 days after it is printed. Please individually mount ten of the copies on heavy-weight paper or similar material. For administrative purposes, this submission should be designated "FPL for approved NDA 21-084." Approval of this submission by FDA is not required before the labeling is used.

Validation of the regulatory methods has not been completed. At the present time, it is the policy of the Center not to withhold approval because the methods are being validated. Nevertheless, we expect your continued cooperation to resolve any problems that may be identified.

We remind you of your Phase 4 commitments specified in the facsimile of your submission dated February 17, 2000. These commitments, to be completed within two years of approval of the NDA, are listed below:

PHARMACOLOGY/TOXICOLOGY:

Due to the possible adverse effects associated with smoking products contaminated with TSP, it is recommended that the Sponsor perform a nonclinical study to evaluate long-term effects of acute exposure to polytetrafluoroethylene fumes.

CLINICAL:

1. Conduct a study to characterize the compatibility of SERPACWA with the Battle Dress Uniform/overgarment and overboots.

2. Conduct a study to determine the extent to which SERPACWA is transferred to smoking products when smoking products are handled by subjects whose hands have been coated with SERPACWA during the process of applying SERPACWA to body surfaces, and who have not washed their hands prior to handling of smoking products. If SERPACWA does transfer to smoking products when the smoking products are handled by subjects who have not washed their hands prior to handling of smoking products, the studies should also address whether washing of hands prior to handling of smoking products reduces the transfer of SERPACWA to smoking products.

3. Conduct an actual use study to determine whether subjects can apply on themselves a thin coat of Skin Exposure Reduction Paste Against Chemical Warfare Agents (SERPACWA) that reduces or prevents the penetration of a dermal permeant to include:

    a. Demonstration that the cutaneous barrier property is immediate upon Skin Exposure Reduction Paste Against Chemical Warfare Agents (SERPACWA) application, or the time interval needed to establish the barrier,

    b. Characterization of how long the barrier effect remains on the skin,

    c. Characterization of the consequences of not cleaning the skin with isopropyl alcohol prior to Skin Exposure Reduction Paste Against Chemical Warfare Agents (SERPACWA) application on the barrier properties of Skin Exposure Reduction Paste Against Chemical Warfare Agents (SERPACWA), and

    d. Characterization of the potential interactions between the M291 Skin Decontamination Kit and Skin Exposure Reduction Paste Against Chemical Warfare Agents (SERPACWA).

Protocols, data, and final reports should be submitted to your IND for this product and a copy of the

cover letter sent to this NDA. If an IND is not required to meet your Phase 4 commitments, please submit protocols, data and final reports to this NDA as correspondence.
The Phase 4 final study reports should be submitted to the Agency within two years of NDA approval. Please submit the relevant protocols to the Agency for review and comment before initializing the studies.

In addition, under 21 CFR 314.82(b)(2)(vii), we request that you include a status summary of each commitment in your annual report to this NDA. The status summary should include the number of subjects entered in each study, expected completion and submission dates, and any changes in plans since the last annual report. For administrative purposes, all submissions, including labeling supplements, relating to these Phase 4 commitments must be clearly designated "Phase 4 Commitments."

Be advised that, as of April 1, 1999, all applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred (63 *FR* 66632). We are waiving the pediatric study requirement for this action on this application.

Please submit one ready-for-distribution package of the drug product when it is available.

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, call Frank H. Cross, Jr., M.A., CDR, Senior Regulatory Management Officer, at (301) 827-2020.

Sincerely,

Robert J. DeLap, M.D., Ph.D.,
Director
Office of Drug Evaluation V
Center for Drug Evaluation and Research

Enclosure

APPEARS THIS WAY
ON ORIGINAL