CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 76-243

LABELING REVIEW(S)

REVIEW OF PROFESSIONAL LABELING
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH

ANDA Number: 76-243 Date of Submission: September 24, 2001

Applicant's Name: West-ward Pharmaceutical Corp.

Established Name: Lithium Carbonate Capsules USP, 300 mg

Labeling Deficiencies:

A. CONTAINERS (100's, 500's, & 1000's)

If space permits, replace "t.i.d." with "three times daily".

B. INSERT

There are significant differences between your proposed labeling and the labeling of the reference listed drug (RLD) Lithium Carbonate Capsules, USP by Roxane laboratories, Inc. The insert labeling for the RLD was approved on November 26, 2001. Please review the attached copy of the approved insert labeling and revise accordingly.

Please revise your labeling as instructed above and submit 12 final printed copies of labels and labeling for a full approval of this application. You may submit 4 copies of draft insert labeling if you prefer.

Prior to approval, it may be necessary to further revise your labeling subsequent to approved changes for the reference listed drug. We suggest that you routinely monitor the following website for any approved changes –

http://www.fda.gov/cder/ogd/rld/labeling_review_branch.html

To facilitate review of your next submission, and in accordance with 21 CFR 314.94(a)(8)(iv), please provide a side-by-side comparison of your proposed labeling with your last submission with all differences annotated and explained.

Wm Peter Rickman
Acting Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

Attachment

Other Comments:

REVIEW OF PROFESSIONAL LABELING CHECK LIST

Established Name	Yes	No	N.A.
Different name than on acceptance to file letter?		X	
Is this product a USP item? If so, USP supplement in which verification was assured. USP 23	X		
Is this name different than that used in the Orange Book?		X	
If not USP, has the product name been proposed in the PF?			X
Error Prevention Analysis			
Has the firm proposed a proprietary name? If yes, complete this subsection.		X	
Do you find the name objectionable? List reasons in FTR, if so. Consider: Misleading? Sounds or looks like another name? USAN stem present? Prefix or Suffix present?			X
Has the name been forwarded to the Labeling and Nomenclature Committee? If so, what were the recommendations? If the name was unacceptable, has the firm been notified?			X
Packaging			
Is this a new packaging configuration, never been approved by an ANDA or NDA? If yes, describe in FTR.		X	
Because of proposed packaging configuration or for any other reason, does this applicant meet fail to meet all of the unprotected conditions of use of referenced by the RLD?		X	
Is this package size mismatched with the recommended dosage? If yes, the Poison Prevention Act may require a CRC.		X	
Does the package proposed have any safety and/or regulatory concerns?		X	
If IV product packaged in syringe, could there be adverse patient outcome if given by direct IV injection?			X
Conflict between the DOSAGE AND ADMINISTRATION and INDICATIONS sections and the packaging configuration?		X	
Is the strength and/or concentration of the product unsupported by the insert labeling?		X	
Is the color of the container (i.e. the color of the cap of a mydriatic ophthalmic) or cap incorrect?		X	
Individual cartons required? Issues for FTR: Innovator individually cartoned? Light sensitive product which might require cartoning? Must the package insert accompany the product?		X	
Are there any other safety concerns?		X	
Labeling			
Is the name of the drug unclear in print or lacking in prominence? (Name should be the most prominent information on the label).		X	
Has applicant failed to clearly differentiate multiple product strengths?			X
Is the corporate logo larger than 1/3 container label? (No regulation - see ASHP guidelines)		X	
Labeling(continued)	Yes	No	N.A.
Does RLD make special differentiation for this label? (i.e., Pediatric strength vs Adult; Oral Solution vs Concentrate, Warning Statements that might be in red for the NDA)		X	
Is the Manufactured by/Distributor statement incorrect or falsely inconsistent between labels and labeling? Is "Jointly Manufactured by...", statement needed?		X	
Failure to describe solid oral dosage form identifying markings in HOW SUPPLIED?		X	
Has the firm failed to adequately support compatibility or stability claims which appear in the insert labeling? Note: Chemist should confirm the data has been adequately supported.		X	
Scoring: Describe scoring configuration of RLD and applicant (page #) in the FTR			
Is the scoring configuration different than the RLD?			X
Has the firm failed to describe the scoring in the HOW SUPPLIED section?			X
Inactive Ingredients: (FTR: List page # in application where inactives are listed)			
Does the product contain alcohol? If so, has the accuracy of the statement been confirmed?		X	
Do any of the inactives differ in concentration for this route of administration?		X	
Any adverse effects anticipated from inactives (i.e., benzyl alcohol in neonates)?		X	

Is there a discrepancy in inactives between DESCRIPTION and the composition statement?		X	
Has the term "other ingredients" been used to protect a trade secret? If so, is claim supported?		X	
Failure to list the coloring agents if the composition statement lists e.g., Opacode, Opaspray?		X	
Failure to list gelatin, coloring agents, antimicrobials for capsules in DESCRIPTION?		X	
Failure to list dyes in imprinting inks? (Coloring agents e.g., iron oxides need not be listed)		X	
USP Issues: (FTR: List USP/NDA/ANDA dispensing/storage recommendations)			
Do container recommendations fail to meet or exceed USP/NDA recommendations? If so, are the recommendations supported and is the difference acceptable?		X	
Does USP have labeling recommendations? If any, does ANDA meet them?	X		
Is the product light sensitive? If so, is NDA and/or ANDA in a light resistant container?		X	
Failure of DESCRIPTION to meet USP Description and Solubility information? If so, USP information should be used. However, only include solvents appearing in innovator labeling.		X	
Bioequivalence Issues: (Compare bioequivalency values: Insert to study. List Cmax, Tmax, T 1/2 and date study acceptable)			
Insert labeling references a food effect or a no-effect? If so, was a food study done?		X	
Has CLINICAL PHARMACOLOGY been modified? If so, briefly detail where/why.		X	
Patent/Exclusivity Issues?: FTR: Check the Orange Book edition or cumulative supplement for verification of the latest Patent or Exclusivity. List expiration date for all patents, exclusivities, etc. or if none, please state.		X	

NOTES/QUESTIONS TO THE CHEMIST:

FOR THE RECORD:

1. MODEL LABELING: Lithium Carbonate Capsules, NDA 17-812/S-17; Approved Nov. 26, 2001.
2. INACTIVE INGREDIENTS: Consistent with the application.
3. PATENTS/EXCLUSIVITIES: None
4. STORAGE TEMPERATURE RECOMMENDATIONS COMPARISON
   - USP: Preserve in well-closed container
   - NDA: None on insert labeling
   - ANDA: Store at controlled room temperature 15^0-30^0C (59^0-86^0F).
5. DISPENSING STATEMENT COMPARISON
   - NDA: Dispense in tight, child-resistant container (USP)
   - ANDA: Dispense in a tight, light-resistant container as defined in the USP using a child-resistant closure.
6. PACKAGE CONFIGURATION
   - NDA: Bottles of 100's and 1000's and blister pack of 100
   - ANDA: Bottles of 100's, 500's and 1000's
7. CONTAINER/CLOSURE
   - Container: HDPE
   - Closure: CRC for the 100's, Regular Caps for the 500's and 1000's
8. FINISHED DOSAGE FORM
   - NDA: No. 2 flesh-colored capsules identified by 54 463.
   - ANDA: No. 1 Grey/Yellow Opaque Hard Gelatin Capsules printed "West-ward 3189" in Black Ink

Date of Review: February 27, 2002 Date of Submission: November 9, 2001

Primary Reviewer: Koung Lee Date: 2/27/02

Team Leader: Charlie Hoppes Date: 2/27/02

cc:

ANDA: 76-243
DUP/DIVISION FILE
HFD-613/KLee/CHoppes (no cc)
V:\FIRMSNZ\WESTWARD\LTRS&REV\76243.na.labeling Review

APPROVAL SUMMARY
REVIEW OF PROFESSIONAL LABELING
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH

ANDA Number: 76-243 Date of Submission: April 4, 2002

Applicant's Name: West-ward Pharmaceutical Corp.

Established Name: Lithium Carbonate Capsules USP, 300 mg

APPROVAL SUMMARY (List the package size, strength(s), and date of submission for approval):

- Do you have 12 Final Printed Labels and Labeling? Yes
- Container Labels (100, 500, 1000): FPL submitted on 4/4/02 are acceptable for approval.
- Professional Package Insert Labeling (Iss. 03/02): FPL submitted on 4/4/02 is acceptable for approval.
- Revisions needed post-approval: Yes

a. Container (100, 500, 1000)

Revise the storage and dispensing statements to be consistent with the package insert.

b. Insert

i. GENERAL

Replace "mEq/l" with "mEq/L" throughout the insert.

ii. PRECAUTIONS

Replace the subsection heading "Usage in Children" with "Pediatric Use".

iii. ADVERSE REACTIONS

Replace "intoxication" with "toxicity" in the first sentence of the second paragraph.

BASIS OF APPROVAL:

- Was this approval based upon a petition? No
- What is the RLD on the 356(h) form: Lithium Carbonate Capsules, 600 mg
- NDA Number: 17-812
- NDA Drug Name: Lithium Carbonate
- NDA Firm: Roxane
- Date of Approval of NDA Insert and supplement #: November 26, 2001; S-017
- Has this been verified by the MIS system for the NDA? Yes
- Was this approval based upon an OGD labeling guidance? No
- Basis of Approval for the Container Labels: Side by side.
- Basis of Approval for the Carton Labeling: Not Applicable

Other Comments:

REVIEW OF PROFESSIONAL LABELING CHECK LIST

Established Name	Yes	No	N.A.
Different name than on acceptance to file letter?		X	
Is this product a USP item? If so, USP supplement in which verification was assured. USP 25	X		
Is this name different than that used in the Orange Book?		X	
If not USP, has the product name been proposed in the PF?			X

Error Prevention Analysis			
Has the firm proposed a proprietary name? If yes, complete this subsection.		X	
Do you find the name objectionable? List reasons in FTR, if so. Consider: Misleading? Sounds or looks like another name? USAN stem present? Prefix or Suffix present?			X
Has the name been forwarded to the Labeling and Nomenclature Committee? If so, what were the recommendations? If the name was unacceptable, has the firm been notified?			X
Packaging			
Is this a new packaging configuration, never been approved by an ANDA or NDA? If yes, describe in FTR.		X	
Because of proposed packaging configuration or for any other reason, does this applicant meet fail to meet all of the unprotected conditions of use of referenced by the RLD?		X	
Is this package size mismatched with the recommended dosage? If yes, the Poison Prevention Act may require a CRC.		X	
Does the package proposed have any safety and/or regulatory concerns?		X	
If IV product packaged in syringe, could there be adverse patient outcome if given by direct IV injection?			X
Conflict between the DOSAGE AND ADMINISTRATION and INDICATIONS sections and the packaging configuration?		X	
Is the strength and/or concentration of the product unsupported by the insert labeling?		X	
Is the color of the container (i.e. the color of the cap of a mydriatic ophthalmic) or cap incorrect?		X	
Individual cartons required? Issues for FTR: Innovator individually cartoned? Light sensitive product which might require cartoning? Must the package insert accompany the product?		X	
Are there any other safety concerns?		X	
Labeling			
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Has applicant failed to clearly differentiate multiple product strengths?			X
Is the corporate logo larger than 1/3 container label? (No regulation - see ASHP guidelines)		X	
Labeling(continued)	Yes	No	N.A.
Does RLD make special differentiation for this label? (i.e., Pediatric strength vs Adult; Oral Solution vs Concentrate, Warning Statements that might be in red for the NDA)		X	
Is the Manufactured by/Distributor statement incorrect or falsely inconsistent between labels and labeling? Is "Jointly Manufactured by...", statement needed?		X	
Failure to describe solid oral dosage form identifying markings in HOW SUPPLIED?		X	
Has the firm failed to adequately support compatibility or stability claims which appear in the insert labeling? Note: Chemist should confirm the data has been adequately supported.		X	
Scoring: Describe scoring configuration of RLD and applicant (page #) in the FTR			
Is the scoring configuration different than the RLD?			X
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Inactive Ingredients: (FTR: List page # in application where inactives are listed)			
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Do any of the inactives differ in concentration for this route of administration?		X	
Any adverse effects anticipated from inactives (i.e., benzyl alcohol in neonates)?		X	
Is there a discrepancy in inactives between DESCRIPTION and the composition statement?		X	
Has the term "other ingredients" been used to protect a trade secret? If so, is claim supported?		X	
Failure to list the coloring agents if the composition statement lists e.g., Opacode, Opaspray?		X	
Failure to list gelatin, coloring agents, antimicrobials for capsules in DESCRIPTION?		X	
Failure to list dyes in imprinting inks? (Coloring agents e.g., iron oxides need not be listed)		X	
USP Issues: (FTR: List USP/NDA/ANDA dispensing/storage recommendations)			
Do container recommendations fail to meet or exceed USP/NDA recommendations? If so, are the recommendations supported and is the difference acceptable?		X	

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NOTES/QUESTIONS TO THE CHEMIST:

FOR THE RECORD:

1. MODEL LABELING: Lithium Carbonate Capsules, NDA 17-812/S-17; Approved Nov. 26, 2001.
2. INACTIVE INGREDIENTS: Consistent with the application.

3. PATENTS/EXCLUSIVITIES:

Patent Data –

No	Expiration	Use Code	Use	File
None				III

Exclusivity Data -

Code/sup	Expiration	Use Code	Description		Labeling Impact
None			There is no unexpired exclusivity for this product		

4. STORAGE TEMPERATURE RECOMMENDATIONS COMPARISON
   - USP: Preserve in well-closed container
   - NDA: None on insert labeling
   - ANDA: Store at controlled room temperature 15^0-30^0C (59^0-86^0F)[see USP].
5. DISPENSING STATEMENT COMPARISON
   - NDA: Dispense in tight, child-resistant container (USP)
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8. FINISHED DOSAGE FORM
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   - ANDA: No. 1 Grey/Yellow Opaque Hard Gelatin Capsules printed "West-ward 3189" in Black Ink

Date of Review: June 5, 2002 Date of Submission: 4/4/02

Primary Reviewer: Koung Lee Date: 6/7/02

Team Leader: Lillie Golson Date: 6/7/02

cc: ANDA: 76-243
DUP/DIVISION FILE
HFD-613/KLee/LGolson (no cc)
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